

TSD File Inventory Index

Date: April 25, 2000

Initial: CML/enev

Facility Name: <u>Ciba-Geigy Corporation (Pur Plastics Division)</u>			
Facility Identification Number: <u>U/D 067 352 989 (see folder notes)</u>			
A.1 General Correspondence	Y	B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	Y	.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	Y
.3 Part A Application and Amendments	X	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure	Y	.3 State Prelim. Investigation Memos	
.1 Correspondence	Y	.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc	Y	D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring	Y	.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		D.5 Corrective Action/Enforcement	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		E. Boilers and Industrial Furnaces (BIF)	
.1 CMS Correspondence		.1 Correspondence	
.2 Interim Measures		.2 Reports	
.3 CMS Workplan		F.1 Imagery/Special Studies (Videos, Photos, Disks, Maps, Blueprints, Drawings, and Other Not Oversized Special Materials.)	
.4 CMS Draft/Final Report		G.1 Risk Assessment	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
D.4 Corrective Action Remediation Implementation		.4 Ecological - Administrative Record	
.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify in individual folder per schedule*

AUG 18 1986

*These are
letters supporting
the confidentiality claim.
Please file with Part A.*

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5C-16

Mr. George H. Stewart
Vice-President & Treasurer
CIBA-GEIGY Corporation
444 Saw Mill River Road
Ardsley, New York 10502

RE: Determination that CIBA-GEIGY's Claim of
Business Confidentiality has been Sub-
stantiated

MID 067 352 989

Dear Mr. Stewart:

This is to notify you of my determination regarding CIBA-GEIGY Corporation (CIBA-GEIGY)'s claim of business confidentiality for certain information contained in CIBA-GEIGY's RCRA financial documents. The documents were submitted for CIBA-GEIGY's Ren Plastics facility in East Lansing, Michigan.

For reasons set forth in the attached Determination of Legal Issues, I recognize CIBA-GEIGY's claims as satisfactorily meeting the guidelines provided in 40 C.F.R. Part 2, Subpart B. The information will be treated as confidential business information.

If you have any questions concerning this matter, please contact T. Leverett Nelson of my staff at (312)886-7951.

Sincerely yours,

Robert B. Schaefer
Regional Counsel

Enclosure

bcc: Augusta Bloom, 5HS-13

STAFF ATTORNEY TAN 8-8-86
SECTION CHIEF mm
BRANCH CHIEF mm
DEPUTY REG. COUNSEL 7/24/86
REGIONAL COUNSEL 8/15/86
OTHER _____
OTHER _____

Jim M.

18 MAR 1985

RECEIVED
MAR 19 1985

WASTE MANAGEMENT
BRANCH

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J. Stewart Johnson
Manager, Hazardous Materials
Safety, Health & Ecology
CIBA-GEIGY Corporation
Ardsley, New York 10502

Re: Confidential Business Information Claim
RCRA Permit No. MID 067352989

Dear Mr. Johnson:

Your April 20, 1984, letter to Mr. Thomas Golz of this Agency concerning the above referenced permit requested that certain financial documentation, submitted by your company, be accorded treatment as Confidential Business Information. The purpose of this letter is to inform you that we are currently determining whether the submitted information is entitled to confidential treatment, and to invite your comments on the following points:

1. We understand your claim to apply only to the information that is deleted in the version of your letter that you have prepared for the public file. Is this a correct reading of your claim?
2. What is the period of time for which confidential treatment is desired? (e.g., until a certain date, until the occurrence of a special event, or permanently?)
3. What measures have been taken by the company to guard against undesired disclosure of this information to others?
4. To what extent has this information been disclosed to others, and what precautions were taken in connection with that disclosure?
5. Have any confidentiality determinations been made previously by this Agency or other federal agencies? If so, provide a copy of any such determination, or reference to it, if available.

6. Does the company assert that disclosure of this information would be likely to result in substantial harmful effects on the business's competitive position, and if so, what would those harmful effects be and why should they be viewed as substantial? Explain the causal relationship between disclosure and such harmful effects.
7. Does the company agree that the subject information is not "voluntary submitted information" as defined in Federal regulations at 40 CFR Section 2.201(i)? If you do not agree, explain how the disclosure of the definition would tend to lessen the availability of similar information to the Agency in the future.

The company may, if it desires, assert a business confidentiality claim covering part or all of the information submitted in response to this letter. Such claim shall be made in the manner described by 40 CFR Section 2.203(b). Information covered by such a claim will be disclosed by the Agency only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B (also be found in the Federal Register at 41 Fed. Reg. 36902, September 1, 1976). If no such claim accompanies the information when it is received by the Agency, it may be made available to the public without further notice to the company. (see 40 CFR Section 2.205(c)).

Comments shall be made within fifteen (15) days after the company's receipt of this notice. Additional time may be requested for response. (see 40 C.F.R. Section 2.205(d)). The Agency shall construe the company's failure to furnish any comments as a waiver of the company's confidentiality claim.

Please make comments to the Office of Regional Counsel, 5C-16, U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Thomas W. Daggett. If you have any questions concerning this matter, please feel free to contact me at (312) 353-2094. Thank you for your cooperation in making this determination.

Sincerely,

Thomas W. Daggett
Associate Regional Counsel

Cc. T. Thomas
M. Gade
R. Glan

D. - FOR OFFICIAL USE ONLY									
W	M	J	D	0	6	7	3	5	2
9	2	8	9	2	1				
1	2								

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002 23 - 26	2 F003 23 - 26	3 F005 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 P092 23 - 26	32 U002 23 - 26	33 U008 23 - 26	34 U009 23 - 26	35 U028 23 - 26	36 U069 23 - 26
37 U107 23 - 26	38 U118 23 - 26	39 U159 23 - 26	40 U162 23 - 26	41 U201 23 - 26	42 U220 23 - 26
43 U221 23 - 26	44 U226 23 - 26	45 U239 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☒ 1. IGNITABLE
(D001)

☒ 2. CORROSIVE
(D002)

☒ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE Nicholas S. [Signature]	NAME & OFFICIAL TITLE (type or print) Plant Manager	DATE SIGNED 8/2/80
--------------------------------------	--	-----------------------

EPA Form 8700-12 (6-80) REVERSE

REN
PLASTICS

Formulated Systems Group
CIBA-GEIGY Corporation
4917 Dawn Avenue
East Lansing, Michigan 48823
Telephone 517 351 5900

CIBA-GEIGY

RECEIVED

FEB 03 1986

SWD - AIS
H.S. EPA, REGION V

RECEIVED

FEB 03 1986

SOLID WASTE BRANCH
U.S. EPA, REGION V

January 29, 1986

EPA Region V
Waste Management Branch
230 S. Dearborn Street
Chicago, IL 60604

Re: CIBA-GEIGY Corporation
MID067352989

Dear Sir:

By this letter and enclosure, CIBA-GEIGY Corporation is notifying you of modifications to the Part A application which was sent to you on June 28, 1983. If you have any questions in regard to this matter, please feel free to contact me.

Very truly yours,



Michael L. Munsell
Industrial Health/Safety Coordinator
Ren Plastics,
CIBA-GEIGY Corporation

*Original submitted
to ~~HEAR~~ for processing
3/86*

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			F M I D O 6 7 3 5 2 9 8 9 T/A											
			1 2 3 4 5 6 7 8 9 10 11 12											

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)		2. NEW FACILITY (Complete item below.)	
<input type="checkbox"/> 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)		<input type="checkbox"/> 2. NEW FACILITY (Complete item below.)	
71		71	
FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)		FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN	
C YR. MO. DAY 8 5 2 0 9 0 1 73 74 75 76 77 78		C YR. MO. DAY 73 74 75 76 77 78	
B. REVISED APPLICATION (place an "X" below and complete Item I above)		<input type="checkbox"/> 2. FACILITY HAS A RCRA PERMIT	
<input checked="" type="checkbox"/> 1. FACILITY HAS INTERIM STATUS		72	

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C T/A C I											
1 2 3 4 5 6 7 8 9 10 11 12											
16 - 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32											
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY		
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)			
X-1	S 0 2	600	G		5						
X-2	T 0 3	20	E		6						
1	S 0 1	16500	G		7						
					8						
3					9						
4					10						
16 - 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32											

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). OR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

W O L J	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES							
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
X-1	K 0 5 4	900	P	T	0	3	D	8	0		
X-2	D 0 0 2	400	P	T	0	3	D	8	0		
X-3	D 0 0 1	100	P	T	0	3	D	8	0		
X-4	D 0 0 2									included with above	

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

EPA I.D. NUMBER (enter from page 1)																		FOR OFFICIAL USE ONLY									
<div> <div>W M I D O 6 7 3 5 2 9 8 9</div> <div>T/A C</div> <div>1</div> </div>																		<div> <div>W</div> <div>DUP</div> <div>T/A C</div> <div>2</div> <div>DUP</div> </div>									
DESCRIPTION OF HAZARDOUS WASTES (continued)																											
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES																
	23	24	25	26	27	28	29	30	31	32	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))												
											27	28	29	27	28	29	27	28	29	27	28	29					
1	D	0	0	1	50,000																						
2	D	0	0	2	100,000																						
3	D	0	0	9	25,000																						
4	F	0	0	2	6,000																						
5	F	0	0	5	150,000																						
6	U	0	0	9	600																						
7	U	0	2	8	600																						
8	U	0	6	9	1,200																						
9	U	2	2	0	500																						
10	U	2	2	1	500																						
11	U	2	2	6	600																						
12																											
13																											
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23																											
24																											
25																											
26																											

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

3	2	1	0	6	7	3	5	2	9	8	9	T/A	C
F	M	I	D	0	6	7	3	5	2	9	8	9	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	4	3	3	1
55	56	57	58	59	60

LONGITUDE (degrees, minutes, & seconds)

8	4	2	7	0	6
72	73	74	75	76	77

VIII. FACILITY OWNER

- ☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		
12	13	14	15

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

ROBERT F. AMBRUSTER

Robert F. Ambruster

1/31/86

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

REN

PLASTICS

June 30, 1983

4917 Dawn Avenue
East Lansing, Michigan 48823
Telephone 517 351-5900

a CIBA-GEIGY Company

RECEIVED
JUL 05 1983
WASTE MANAGEMENT
BRANCH

Mr. Thomas Golz
EPA Region V
Waste Management Branch
230 S. Dearborn Street
Chicago, IL 60604

Re: CIBA-GEIGY Corporation
MID067352989

Dear Mr. Golz:

Enclosed please find a modified Part A application. The modifications are the result of a review of amounts of wastes generated and stored during 1982. Also the mailing address and phone number shown in your records may not be correct as they were changed in 1982 as well. The new mailing address and telephone number are:

CIBA-GEIGY Corporation
4917 Dawn Avenue
East Lansing, MI 48823

517-351-5900

If there are any questions regarding this material, feel free to contact me.

Very truly yours,



Michael L. Munsell
Industrial Health/Safety Coordinator
Ren Plastics,
CIBA-GEIGY Corporation

Enclosures

MLM/ig
2/B-2

FORM 3 RCRA		ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			S F M I D 0 6 7 3 5 2 9 8 9 T/A C 1											
			1 2 13 14 15											

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C DUP T/A C 1														
1 2 13 14 15														
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)						
X-1	S 0 2	600	G		5									
X-2	T 0 3	20	E		6									
1	S 0 1	11,000	G		7									
2					8									
3					9									
4					10									
16 - 18 19 27 28 29 - 32 16 - 18 19 27 28 29 - 32														

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS.....	P
TONS.....	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS.....	K
METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES							
				1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
X-1	K 0 5 4	900	P	T	0	3	D	8	0		
X-2	D 0 0 2	400	P	T	0	3	D	8	0		
X-3	D 0 0 1	100	P	T	0	3	D	8	0		
X-4	D 0 0 2									included with above	

CONTINUE ON REVERSE

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	M	I	D	0	6	7	3	5	2	9	8	9	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	4	3	3	1
65	66	67	68	69	71

LONGITUDE (degrees, minutes, & seconds)

8	4	2	7	0	6
72	74	75	76	77	79

VIII. FACILITY OWNER

- ☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX										4. CITY OR TOWN										5. ST.										6. ZIP CODE									
F										G																													
15 16										45 15 16										55 56 58 59 61 62 65										40 41 42 47 51									

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Nicholas L. Tartaglione	Nicholas L. Tartaglione	6/28/83

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED



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FORM 1 GENERAL		ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> (Read the "General Instructions" before starting.)		I. EPA I.D. NUMBER MID067352989	
LABEL ITEMS				GENERAL INSTRUCTIONS	
I. EPA I.D. NUMBER		MID067352989		If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	
II. FACILITY NAME		CIBA-GEIGY CORPORATION			
V. FACILITY MAILING ADDRESS		4917 DAWN AVE EAST LANSING, MI 48823			
VI. FACILITY LOCATION		4917 DAWN AVE EAST LANSING, MI 48823			

SPECIFIC QUESTIONS		MARK 'X'		SPECIFIC QUESTIONS		MARK 'X'	
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY	
1	SKIP Ciba Geigy Corporation

IV. FACILITY CONTACT	
A. NAME & TITLE (last, first, & title)	
2 Munsell Michael Safety Coord	
B. PHONE (area code & no.)	
517 393 1560	

V. FACILITY MAILING ADDRESS	
A. STREET OR P.O. BOX	
3 P.O. Box 23037	
B. CITY OR TOWN	
4 Lansing	
C. STATE	D. ZIP CODE
MI	48909

VI. FACILITY LOCATION		
A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		
5 4917 Dawn Ave		
B. COUNTY NAME		
Ingham		
C. CITY OR TOWN		
6 East Lansing		
D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
MI	48823	065

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C	7	2	8	2	1	(specify)					C	7	(specify)						
15	16	17	18	19						15	16	17	18	19					
C. THIRD										D. FOURTH									
C	7	(specify)								C	7	(specify)							
15	16	17	18	19						15	16	17	18	19					

VIII. OPERATOR INFORMATION

A. NAME																																																												B. Is the name listed in Item VIII-A also the owner?									
C	8	Ciba Geigy Corporation																																																										<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 66									
15	16																																																																				
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)																														D. PHONE (area code & no.)																																							
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify)																														C A 9 1 4 4 7 8 3 1 3 1																																							
P = PRIVATE P (specify)																														15 16 17 18 19 20 21 22 23 24																																							

E. STREET OR P.O. BOX																														F. CITY OR TOWN																														G. STATE										H. ZIP CODE										IX. INDIAN LAND									
44 Sawmill River Road																														A. Edsley																														NY										10502										Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 52									
26																														40																														41										42										43									

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)															D. PSD (Air Emissions from Proposed Sources)																
C	9	N	N.A.												C	9	P	5.38-80													
15	16	17	18													15	16	17	18												
B. UIC (Underground Injection of Fluids)															E. OTHER (specify)																
C	9	U	N.A.												C	9	N.A.														
15	16	17	18													15	16	17	18												
C. RCRA (Hazardous Wastes)															E. OTHER (specify)																
C	9	R	Applying												C	9	N.A.														
15	16	17	18													15	16	17	18												

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

Blending of liquid plastics with modifiers to manufacture liquid industrial materials

F9A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)																														B. SIGNATURE																														C. DATE SIGNED																			
H. Fesenmeyer, Vice President Plastics and Additives Division																														H. Fesenmeyer																														11/14/80																			

COMMENTS FOR OFFICIAL USE ONLY

C																																																										
C																																																										
15	16																																																									

CONTINUE ON REVERSE

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS P
TONS T

METRIC UNIT OF MEASURE CODE
KILOGRAMS K
METRIC TONS M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
MI 00673529893										DUP									
DESCRIPTION OF HAZARDOUS WASTES (continued)										D. PROCESSES									
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))											
				27	28	29	30	31	32	33	34								
1	F002	1500000	P	S01															
2	F003	400000	P	S01															
3	F005	17000000	P	S01															
4	U002	10000	P	S01															
5	U008	10000	P	S01															
6	U009	10000	P	S01															
7	U028	100000	P	S01															
8	U069	100000	P	S01															
9	U107	100000	P	S01															
10	U118	300000	P	S01															
11	U159	100000	P	S01															
12	U162	300000	P	S01															
13	U220	500000	P	S01															
14	U221	50000	P	S01															
15	U226	1000000	P	S01															
16	D001	8000000	P	S01															
17	D002	400000	P	S01															
18	D003	100000	P	S01															
19	D004	50000	P	S01															
20																			
21																			
22																			
23																			
24																			
25																			
26																			

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S	F	M	I	D	0	6	7	3	5	2	9	8	9	3	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	4	3	3	1	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

8	4	2	7	0	6
72	73	74	75	76	77

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX															4. CITY OR TOWN															5. ST.					6. ZIP CODE									
F															G																													
15 16															45 15 16															40 41 42					47 81									

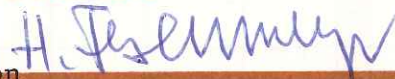
IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

H. Fesenmeyer
Vice President, Plastics and Additives, Division

B. SIGNATURE



C. DATE SIGNED

11/14/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

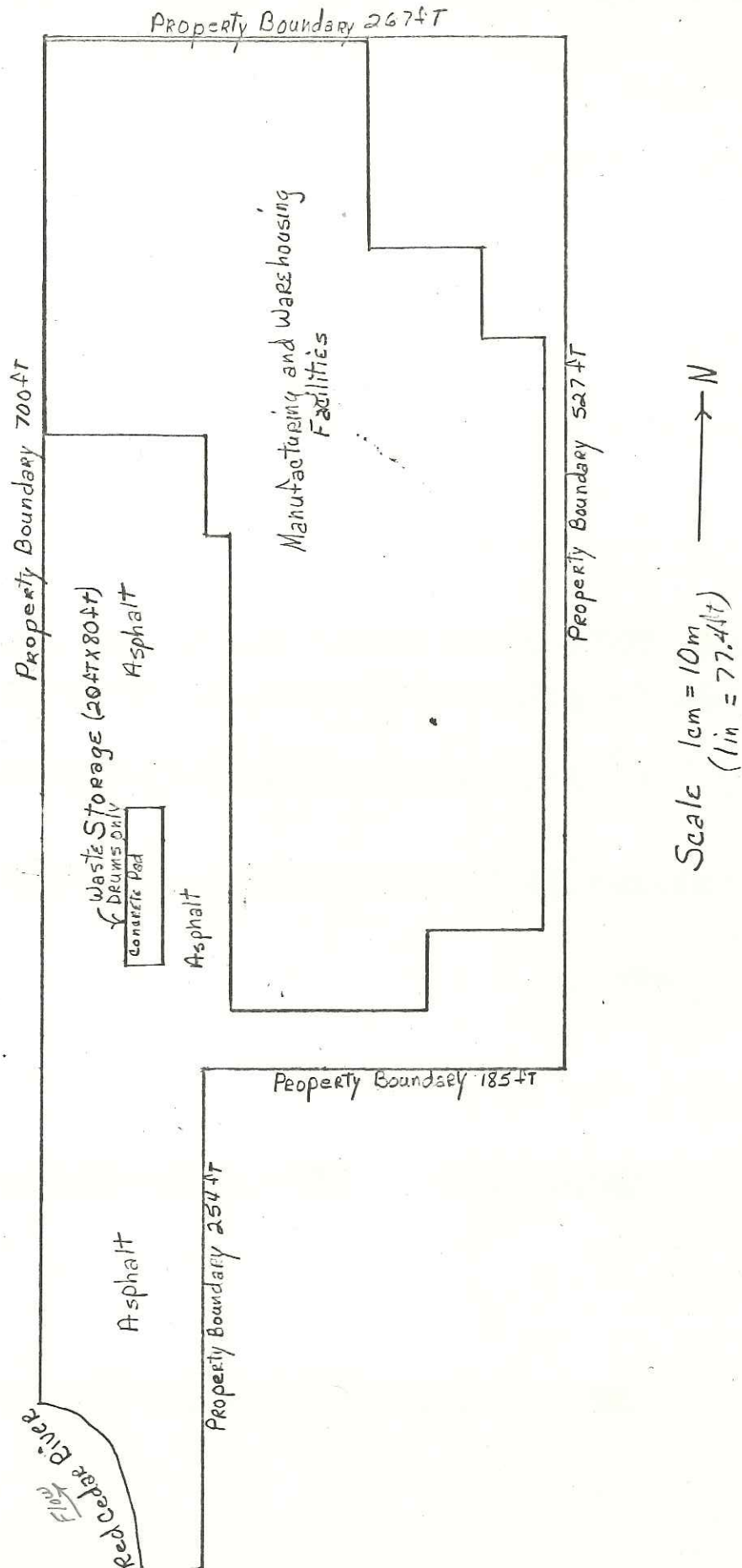
B. SIGNATURE

C. DATE SIGNED

Michigan Air Quality Permits

538-80
539-80
688-80
689-80
690-80
691-80
806-80
807-80
808-80
809-80

V. FACILITY DRAWING (see page 4)





UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

JUN 14 1982

Mr. Michael Munsell
Ciba Geigy Corporation
P.O. Box 23037
Lansing, Michigan 48909

RE: Interim Status Acknowledgement
FACILITY NAME: Ciba Geigy Corporation

USEPA ID No. MID067352989

Dear Mr. Munse1l:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: H. Fesenmeyer

AKS
6/14/82

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	I. EPA I.D. NUMBER											
			S F M I D O 6 7 3 5 2 9 8 9 T/A											
			1 2 3 4 5 6 7 8 9 10 11 12 13 14											

FOR OFFICIAL USE ONLY		COMMENTS
APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	
23	24 25 26 27 28 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S C T/A C														
D U P														
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15														
LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY					
		1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)				1. AMOUNT	2. UNIT OF MEASURE (enter code)						
X-1	S 0 2	600	G		5									
X-2	T 0 3	20	E		6									
1	S 0 1	16500	G		7									
					8									
					9									
3														
4					10									

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE
POUNDS. P
TONS. T

METRIC UNIT OF MEASURE CODE
KILOGRAMS. K
METRIC TONS. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY																					
S	W	M	I	D	O	6	7	3	5	2	9	8	9	T/A	C	S	W	M	I	D	O	6	7	3	5	2	9	8	9	T/A	C			
1	2													13	14	15	1	2											13	14	15	23		26
DESCRIPTION OF HAZARDOUS WASTES (continued)																																		
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		D. PROCESSES																							
	23	-	26	27	38				36	37	1. PROCESS CODES (enter)																2. PROCESS DESCRIPTION (if a code is not entered in D(1))							
1	D	0	0	1	50,000																													
2	D	0	0	2	100,000																													
3	D	0	0	9	25,000																													
4	F	0	0	2	6,000																													
5	F	0	0	5	150,000																													
6	U	0	0	9	600																													
7	U	0	2	8	600																													
8	U	0	6	9	1,200																													
9	U	2	2	0	500																													
10	U	2	2	1	500																													
11	U	2	2	6	600																													
12																																		
13																																		
14																																		
15																																		
16																																		
17																																		
18																																		
19																																		
20																																		
21																																		
22																																		
23																																		
24																																		
25																																		
26																																		

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	M	I	D	O	6	7	3	5	2	9	8	9	T/A	C
1	2													13	14 15
															6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

LONGITUDE (degrees, minutes, & seconds)

4	2	4	3	3	1
65	66	67	68	69	71

8	4	2	7	0	6
72	74	75	76	77	79

VIII. FACILITY OWNER

- ☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX										4. CITY OR TOWN										5. ST.		6. ZIP CODE					
F										G																	
15 16										45 15 16										40 41 42		47 51					

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

ROBERT F. AMBRUSTER

Robert F. Ambruster

1/31/86

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

REN
PLASTICS

Formulated Systems Group
CIBA-GEIGY Corporation
4917 Dawn Avenue
East Lansing, Michigan 48823
Telephone 517 351 5900

CIBA-GEIGY

RECEIVED

FEB 03 1986

**SWD - AIS
U.S. EPA, REGION V**

January 29, 1986

EPA Region V
Waste Management Branch
230 S. Dearborn Street
Chicago, IL 60604

Re: CIBA-GEIGY Corporation
MID067352989

RECEIVED

FEB 03 1986

**SOLID WASTE BRANCH
U.S. EPA, REGION V**

Dear Sir:

By this letter and enclosure, CIBA-GEIGY Corporation is notifying you of modifications to the Part A application which was sent to you on June 28, 1983. If you have any questions in regard to this matter, please feel free to contact me.

Very truly yours,



Michael L. Munsell
Industrial Health/Safety Coordinator
Ren Plastics,
CIBA-GEIGY Corporation

MAR 27 1986

Mr. Michael L. Munsell
 Industrial Health/Safety Coordinator
 CIBA-GEIGY Corporation
 4917 Dawn Avenue
 East Lansing, Michigan 48823

RE: CIBA-GEIGY
 MID 067 352 989

Dear Mr. Munsell:

This letter is in response to your letter dated January 29, 1986 and your revised Part A application dated January 31, 1986. We cannot accept the revised Part A because a change during interim status does not appear to be justified under 40 CFR 270.72. Unless such a change is justified, you must submit Part B of your hazardous waste permit application and obtain a permit prior to increasing the capacity of interim status units.

In your letter you referred to a previous Part A that your facility sent to our agency, dated June 28, 1983. This request for a change in your process design capacity was never approved. The limit of the process design capacity was set when your facility received the interim status acknowledgement letter dated June 14, 1982.

If you have any questions, please contact Goldie Seals of my staff, at (312) 353-1429.

Sincerely,

Y. J. Kim
 Acting Chief, Technical Programs Section

5HS-JCK-13:WMD:SWB:TPS:MICHIGAN READ FILE:G. Seals:G. Words:Draft Typed:3/24/86
 Corr: 3/24 3/25: Final Typing 3/25/86

Disk No. 1

	TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	WMB CHIEF	WMD DIR
INIT. DATE	<i>YJK</i> 3/25/86	<i>GES</i> 3/25/86			<i>YJK</i> 3/25/86			<i>YJK</i> 3/26/86		



5650 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909
Telephone 517 393-1500
a CIBA-GEIGY Company

November 14, 1980

Add Trans., Hwy. 3-12-81

EPA Region Office V
P.O. Box 7861
Chicago, Illinois 60680

Attn: Mr. Y.J. Kim

Re: EPA Generator Identification Number MID067352989
RCRA - Transporter Identification Number Request

Dear Mr. Kim:

We have filed the Notification of Hazardous Waste Activity Form (EPA Form 8700-12) with your office prior to August 18, 1980, and have received, in return, the above EPA Generator Identification Number.

We are, at this time, requesting that we be granted an EPA Highway Transporter Identification Number. We may decide in the near future, to develop and use a private motor carrier fleet to transport our own hazardous waste to designated EPA approved treatment and disposal facilities.

Sincerely yours,
Ciba-Geigy Corporation

N.L. Tartaglione

N.L. Tartaglione
Plant Manager

NLT/da/1/A-10

NOV 15 1980

CIBA-GEIGY Corporation
Formulated Systems Group
4917 Dawn Avenue
East Lansing, MI 48823
(517) 351-5900

CIBA-GEIGY

March 23, 1988

U.S. Environmental Protection Agency
Region 5
230 South Dearborn St.
Chicago, IL 60604

Dear Sir or Madam,

During an internal environmental audit, we were unable to find a copy of the 1985 Biennial Facility report. We believe we filed this report with the EPA but do not have a copy.

From our records, we were able to reconstruct the information required and have enclosed a copy of the 1985 report for your files.

If you have any questions in this matter, please contact me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael L. Munsell". The signature is fluid and cursive, with the first name "Michael" and last name "Munsell" clearly distinguishable.

Michael L. Munsell
SH&E Specialist

MLM/ig/l

Facility Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

IX. FACILITY'S EPA I.D. NO.

T/A C

FIMIID06735298911
1 2 13 14 15

X. GENERATOR'S EPA I.D. NO.

GMIID0673529891
16 28

XI. GENERATOR NAME (specify generator from whom all wastes on this page were received)

CIBA-GEIGY Corporation

ON-SITE ☒

XII. GENERATOR ADDRESS

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1985 (complete this section only once for your facility)

S01	_____	AMOUNT OF WASTE	UOM	S02	_____	AMOUNT OF WASTE	UOM	S03	_____	AMOUNT OF WASTE	UOM
	22										
S04	_____	AMOUNT OF WASTE	UOM	S05	_____	AMOUNT OF WASTE	UOM				

XIV. WASTE IDENTIFICATION AND MANAGEMENT

Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)	C. Handling Method	D. Amount of Waste	E. Unit of Measure
0101011 29 32	1	Solvent soaked rags, Solvent cut epoxy	D 0 0 1 33 36 37 40	S 0 1	_____	2 T
010102	2	Off specification and outdated Amine based hardeners	D 0 0 2	S 0 1	_____	3 T
010103	3	Off specification and outdated Urethanes containing Mercury	D 0 0 9	S 0 1	_____	4 T
010104	4	Halogenated solvents used for cleaning	F 0 0 2	S 0 1	_____	3 T
010105	5	Solvents used to clean equipment	D 0 0 1 F 0 0 5		_____	7.3 T
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1983

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

I. NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1983 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
- 2 Small Quantity Generator
- 4 Exempt
- 5 Beneficial Use
- 9 Closed

Please print/type with elite type (12 characters per inch)

II. GENERATOR'S EPA I.D. NUMBER

F M I D 0 6 7 3 5 2 9 8 9 T/A C
1 2 13 14 15

SITSD

This Installation's Non-Regulated Status is Expected to Apply:

- ☐ For 1983 Only ☐ Permanently
- ☐ Other _____

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF INSTALLATION

C I B A - G E I G Y C o r p o r a t i o n
30 69

IV. INSTALLATION MAILING ADDRESS

3 4 9 1 7 D a w n A v e n u e
15 16 45

Street or P.O. Box

4 E a s t L a n s i n g M I 4 8 8 2 3
15 16 41 42 47 51

City or Town

State Zip Code

V. LOCATION OF INSTALLATION (if different than section IV above)

5
15 16 45

Street or Route number

6
15 16 41 42 47 51

City or Town

State Zip Code

VI. INSTALLATION CONTACT

2 M u n s e l l M i c h a e l
15 16 45

Name (last and first)

5 1 7 - 3 5 1 - 5 9 0 0
46 55

Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Nicholas L. Turkyline Plant Mgr.
Print/Type Name Title

Signature of Authorized Representative

Date Signed

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G	M	I	D	0	6	7	3	5	2	9	8	9	1	
1	2											13	14	15

T/A C

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

CIBA-GEIGY Corporation

X. FACILITY'S EPA I.D. NO.

F	A	L	D	0	0	1	2	2	1	9	0	2
16												28

XI. FACILITY ADDRESS

P. O. Box 113
McIntosh, AL 36553

XII. TRANSPORTATION SERVICES USED

Southeastern Waste Treatment, Inc.

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Ignitable waste solvents mixture from cleaning equipment	0 8	D 0 0 1 35 38 39 42	2 7 0 0 0	P
		Mixture of alcohols, toluene and aromatics	33 34 43	46 47 50 51	59 60	
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G	M	I	D	0	6	7	3	5	2	9	8	9	1
1	2										13	14	15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

Waste Research & Reclamation Co., Inc.

X. FACILITY'S EPA I.D. NO.

F	W	I	D	9	9	0	8	2	9	4	7	5
16												28

XI. FACILITY ADDRESS

Route 7, Highway 93 South
Eau Claire, WI 54701

XII. TRANSPORTATION SERVICES USED

Ashland Chemical Co.
Waste Research & Reclamation Co., Inc.

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard Code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Ignitable waste solvents from cleaning equipment, mixture of	0 8 35	D 0 0 1 38 39 42	1 0 7 8 9 6	P
		2 alcohols, toluene and aromatics	33 34 43	46 47 50 51		
		3 Halogenated waste solvents mixture of methylene chloride,	1 5	F 0 0 2	2 5 4 9	P
		4 1,1,1 Trichlorethane				
		5				
		6				
		7				
		8				
		9				
		10				
		11				
		12				

XIV. COMMENTS (enter information by section number—see instructions)

Generator Biennial Hazardous Waste Report for 1983 (cont.)

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

VIII. GENERATOR'S EPA I.D. NO.

G	M	I	D	0	6	7	3	5	2	9	8	9	T/A C
1	2												13 14 15

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)
 Chemical Waste Management, Inc.
 Emelle Facility

X. FACILITY'S EPA I.D. NO.

F	A	L	D	0	0	0	6	2	2	4	6	4
16												28

XI. FACILITY ADDRESS

State Highway 17, Mile Marker 163
 Emelle, AL 35459

XII. TRANSPORTATION SERVICES USED

Chemical Waste Management, Inc.

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	32	1 Off-spec. product and residues containing amines	1 5 35	D1 0 0 2 38 39 42	4 0 8 4 2	P
		2 Off-spec. product and residues containing organic Mercuries	1 5	D1 0 0 9	2 5 8 2 2	P
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

This report is for the calendar year ending December 31, 1983.
Read All Instructions Carefully Before Making Any Entries on Form

Page 1 of _____

This report is for the calendar year ending December 31, 1983.

Date rec'd: _____ Rec'd by: _____

CIBA-GEIGY Corp.

ON-SITE 

IX. FACILITY'S EPA I.D. NO.

T/A C

[illegible]

XII. GENERATOR ADDRESS

X. GENERATOR'S EPA I.D. NO.

G M I D 0 6 7 3 5 2 9 8 9
16 28

XIII. TOTAL WASTE IN STORAGE ON DECEMBER 31, 1983 (complete this section only once for your facility)

XIII. TOTAL WASTE (9, 8, 3, 2) (P) (UOM) S02 (AMOUNT OF WASTE) (UOM) S03 (AMOUNT OF WASTE) (UOM)
S04 (AMOUNT OF WASTE) (UOM) S05 (AMOUNT OF WASTE) (UOM)

XIV. WASTE IDENTIFICATION

XIV. WASTE IDENTIFICATION																								
Sequence #	Line #	A. Description of Waste	B. EPA Hazardous Waste No. (see instructions)								C. Handling Method	D. Amount of Waste								E. Unit of Measure				
	1	Ignitable spent solvents from cleaning. Blend of alcohols, toluene and aromatics	D	0	0	1					S	0	1			1	2	3	6	3	0	P		
29	32		33			36	37			40														
	2	Chlorinated spent solvents from cleaning. Blend of Methylene chloride + 1,1,1 Trichlorethane	F	0	0	2					S	0	1						2	5	4	9	P	
	3																							
	4	Off-spec. product and residues containing amines	D	0	0	2					S	0	1						4	0	8	4	2	P
	5	Off-spec. product and residues containing organic Mercuries	D	0	0	9					S	0	1						1	9	2	6	7	P
	6																							
	7																							
	8																							
	9																							
	10																							
	11																							
	12																							

XV. COMMENTS (enter information by section number—see instructions)

Environmental Protection Department

CIBA-GEIGY Corporation
Ardsley, New York 10502-2699
Telephone 914 478 3131

CIBA-GEIGY

March 26, 1990

O: WMD-
CC: RF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

1189

Mr. Valdas V. Adamkus
Regional Administrator
US EPA Region V
230 S. Dearborn Street
Chicago, Illinois 60604

RE: RCRA Demonstration Financial Responsibility 1990 - Financial
Test For Liability Coverage and Closure and Post-Closure:
CIBA-GEIGY - Facilities in Region V

Dear Mr. Adamkus:

Enclosed are financial documents from CIBA-GEIGY Corporation. Two complete sets of documents are included with this package. Set 1 is considered Confidential Business Information and has been so identified on the original signature copy. Set 2, for public record has the Confidential Business Information deleted.

The documentation demonstrates that CIBA-GEIGY Corporation satisfies the requirements of the Financial Test Mechanism for Liability and Closure and Post-Closure care of its treatment, storage and disposal facilities, based on the year ending 1989.

CIBA-GEIGY Corporation owns and/or operates seven plant sites which utilize the Financial Test Option to demonstrate financial responsibility for Liability Coverage requirements under RCRA regulations. For four sites, the Financial Test Option is utilized to demonstrate financial responsibility for Closure and/or Post-Closure cost, and three sites utilize the Letter of Credit option to demonstrate financial responsibility for Closure and/or Post-Closure cost under RCRA regulations.

If there are questions or if I can supply additional information, please do not hesitate to contact me at 914-478-3131, extension 2380.

Sincerely yours,

Dorothy Kelly

Dorothy Kelly
Environmental Protection Supervisor

A: Region V

RECEIVED

APR 6 1990

U. S. EPA, REGION V
SWB - PMS

RECEIVED

MAY 14 1990

U. S. EPA, REGION V
SWB - PMS

RECEIVED

APR 02 1990

U. S. EPA REGION 5
OFFICE OF REGIONAL ADMINISTRATOR

CIBA-GEIGY Corporation
Ardsley, New York 10502-2699
Telephone 914 478 3131

CIBA-GEIGY

March 26, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Alan Howard
Director, Department of Natural Resources
Department of Natural Resources
P.O.Box 30241
Lansing, MI 48909

Re: RCRA Demonstration Financial Responsibility
1990 - Letter of Credit for Closure and Financial
Test for Liability Coverage - E. Lansing, MI - MID067352989

Dear Mr. Howard:

Enclosed are financial documents from CIBA-GEIGY Corporation. Two complete sets of documents are included with this package. Set 1 is considered Confidential Business Information and has been so identified on the original signature copy. Set 2, for public record, has the Confidential Business Information deleted.

The documentation demonstrates that CIBA-GEIGY Corporation satisfies the requirements of the Financial Test Mechanism for Liability Coverage for its treatment, storage and disposal facilities, based on its fiscal year ending December 29, 1989. In addition, our amended Letter of Credit to update the closure cost estimates for MID067352989 listed in Appendix A has been sent to you directly from the Chase Manhattan Bank, N.A.

CIBA-GEIGY Corporation owns and/or operates seven plant sites which utilize the Financial Test Option to demonstrate financial responsibility for Liability Coverage requirements under RCRA regulations. For four sites, the Financial Test Option is utilized to demonstrate financial responsibility for Closure and/or Post-Closure cost, and three sites utilize the Letter of Credit Option to demonstrate financial responsibility for Closure and/or Post-Closure cost under RCRA regulations.

If you have any questions or if I can supply additional information, please do not hesitate to contact me at 914-478-3131 extension 2380.

Sincerely yours,

Dorothy Kelly

Dorothy Kelly
Environment Protection Supervisor

A:MI01

SET 2

PUBLIC RECORD

CIBA-GEIGY CORPORATION RCRA FINANCIAL DOCUMENTATION

Letter From Chief Financial Officer

I am the chief financial officer of CIBA-GEIGY Corporation, 444 Saw Mill River Road, Ardsley, New York 10502. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of 40 CFR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and nonsudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265: see Exhibit 1.

The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, liability coverage for both sudden and nonsudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None.

1. The firm identified above owns or operates the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility: see Exhibit 1.
2. The firm identified above guarantees, through the guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure and post-closure care of the following facilities owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.
3. In states where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure or post-closure cost estimates covered by such a test are shown for each facility: see Exhibit 1.
4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanisms specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms.

The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None.

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under 40 CFR Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the last Friday in December. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 29, 1989.

A:MI05

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
CHARLES J. FILLARD
GORDON E. GUYER
KERRY KANMER
C. STEWART MYERS
DAVID C. OLSON
RAYMOND ROUPPE



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48208

DAVID F. HALES, Director

January 9, 1989

Mr. Michael L. Munsell
SH & E Specialist
CIBA-GEIGY Corporation
4917 Dawn Avenue
East Lansing, Michigan 48823

Dear Mr. Munsell:


Subject: Closure Plan Approval
MID 067 352 989

The Waste Management Division (WMD) has completed its review of the revised closure plan for the hazardous waste container storage areas submitted in November, 1988. The WMD hereby approves the closure plan subject to the attached stipulations. In accordance with 40 CFR §265.112(d)(4), the modified closure plan is the approved closure plan.

Closure of RCRA interim status units does not release the facility from its responsibilities under the Hazardous and Solid Waste Amendments of 1984 (HSWA). All interim status facilities are subject to the corrective action requirements.

If you have any questions regarding this approval, please contact Mr. Stephen Blayer at 517-373-7739 or me.

Sincerely,


Alan J. Howard, Chief
Waste Management Division
517-373-9523

Attachments

cc: Ms. Marilyn Sabadaszka, U.S. EPA
Mr. Richard Traub, U.S. EPA
Mr. Leroy Vahovick, DNR
Mr. Kenneth Burda, DNR/C&E File
Mr. Stephen Blayer, DNR

CLOSURE PLAN APPROVAL STIPULATIONS
CIBA-GEIGY CORPORATION
EAST LANSING, MICHIGAN
MID 067 352 989

1. Rinsate from washing each of the three storage pads shall be characterized to a degree necessary for proper disposal. Wash/rinse water contaminated with a listed hazardous waste is considered a hazardous waste by definition. Wash/rinse water contaminated with a characteristic waste is only hazardous if it still exhibits a characteristic. If the wash/rinse water is hazardous, it must be treated at a properly licensed hazardous waste treatment facility. If the wash/rinse water is nonhazardous, it may be discharged to a Publicly Owned Treatment Works (POTW).
2. Background must be established if mercury is detected during soil sampling. A minimum of four samples shall be used to establish "background" in soils to account for natural occurrences and variability within each distinctive soil horizon. Background samples must be collected in an "uncontaminated" area. Based on waste type, contaminant mobility, operation practices and soil type (sand, silty-sand, clay), an estimate of contamination depth must be made and background samples taken at comparable depth. Multiple soil horizons must have background established separately (i.e., minimum of four samples per each soil unit).
3. Depth increments for background and soil sampling are dependent on subsurface soils. For background soil testing, and soil testing within the contaminated area, CIBA-GEIGY shall use 0.25 to 0.5 foot depth intervals for clays, and 1.0 to 5.0 foot depth intervals for silts-sands.
4. In addition to the soil sampling outlined in the closure plan, a soil sample must be taken at the outfall of the storm sewer to determine if any spills have gone through the storm sewer and into the river. The location of the additional soil sample will be determined by Waste Management Division staff during closure of the facility.
5. Analysis for purgeable halocarbons and volatile aromatics must be completed according to SW-846 Third Edition test methods 8010 and 8020 rather than EPA test methods 601 and 602 as specified in Attachment A of the closure plan.
6. CIBA-GEIGY Corporation shall notify Waste Management Division Lansing District staff (517-322-1300) and Lansing Hazardous Waste Permits Unit staff (517-373-2730) at least two working days in advance of background and soil sampling, storage pad decontamination, and soil and concrete removal and disposal to enable staff to be present to observe and/or take samples.
7. The certification submitted to verify that closure has been carried out in accordance with the approved closure plan shall include all pertinent information listed in the attached "Closure Certification Checklist."

WASTE MANAGEMENT DIVISION
CLEAN CLOSURE CERTIFICATION CHECKLIST
(Guidance Document)

This checklist was developed to review RCRA clean closures. Due to direct reference to 40 CFR 264 Subpart G by Act 64, Rule 613; Act 64 closures should also be evaluated by this checklist.

Documentation supporting the independent registered professional engineer's certification can be requested under 40 CFR 264.115 and 265.115 (as of October 29, 1986). The owner/operation must submit at least two copies of certification documentation, one for MDNR, and one for the EPA files.

The checklist identifies items recommended to properly evaluate a closure certification. These items are not "absolutes". Other information or substitutions may be provided with technically justify and certify a "clean closure". The WMD Draft "How Clean is Clean" procedure is a recommended reference.

This checklist can be used for land disposal facilities and storage facilities. Several of the items would not be required for a storage facility where testing was minimal. Items 1 thru 5 would be required for all closures. Items 6 thru 11 would be optional for storage facilities, dependent on extent of testing required. Land disposal facilities would require all items listed.

1. Manifests (or some type of manifest/waste removal summary) of where and how much waste was shipped.
2. Certification statement is needed by the owner/operator AND an independent registered engineer. All independent registered professional engineer certificates must have an original stamp on at least one copy.
3. Summary of decontamination procedures (pressure wash, stream clean, etc.) and how waste water was disposed.
4. Summary analysis (include conditions of haul roads, time table, soil and groundwater results, weather conditions, runoff controls, equipment decontamination, etc.).
5. Results of all tests used to determine clean closure (chart, tables, lab sheets).
6. Statistical comparisons on sampling results compared to background. (This should include full computations on background and statistical analysis).
7. Sampling and analysis procedures (specify references).
8. Final depth and elevations of excavations of wastes and soils.
9. Properly labelled and easily identified sampling grid stations (map); including background stations.
10. Groundwater data (and statistical evaluation) used to determine if groundwater degradation has occurred (usually four sets of replicate analysis compared to sampling event after closure activities). Monitor well construction details and sampling and analysis procedures may be required if documentation is not in the file.
11. Summary of final restoration of excavated area... information on fill material used and/or future land use outline. If clean closure cannot be achieved (e.g. contaminated soils to water table and groundwater results show contamination) this summary item should be used to address the post closure program and/or corrective action.
12. A copy of the approved closure plan and letter of closure approval.

MID 067 352 989

CLOSURE PLAN FOR THREE (3)
HAZARDOUS WASTE STORAGE AREAS

PREPARED FOR:

CIBA-GEIGY CORP.
EAST LANSING, MICHIGAN

PREPARED BY:

SEG ENGINEERS & CONSULTANTS, INC.
1120 MAY STREET
LANSING, MICHIGAN 48906

JUNE, 1988

RECEIVED
JUL 27 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

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1-1a CLOSURE PLAN FOR THREE (3) HAZARDOUS WASTE STORAGE AREAS

This closure plan is being submitted in accordance with 40 CFR 265.111-115. This plan identifies all steps that will be necessary to close three hazardous waste storage areas at the Ciba-Geigy Facility, East Lansing, Michigan plant (MID #067352989) as required in State Act 64, Rule 601(3)(a).

Ciba-Geigy will maintain an on-site copy of the approved closure plan and all revisions to the plan until the certification of closure completeness has been submitted and accepted by Michigan Department of Natural Resources (MDNR) Waste Management Division.

Additionally, SEG Engineers & Consultants, Inc. (SEG) will prepare a site safety plan in accordance with 29 CFR 1910.120 to cover the conduct of all persons associated with the sampling and subsequent closure activities.

Waste Storage Area I and II (See Figure 1) are located within the confines of the manufacturing/warehouse portions of the Ciba-Geigy facility.

Waste Storage Area I consists of:

- A sealed reinforced concrete floor
- A masonry block wall (east side)
- A vent hood with associated ductwork, along the east wall

Waste Storage Area II consists of:

- A sealed reinforced concrete floor
- Three masonry block walls (north, east and west sides)
- A vent hood and associated ductwork along the west wall

Waste Storage Area III (see Figure 1) is a fabricated steel building located outside and to the west of the manufacturing/warehouse building. It consists of a reinforced concrete floor and uninsulated metal roof and end panels (north and south end).

Ciba-Geigy will implement this plan within 90 days following approval of this plan by MDNR.

Upon completion of the closure of all three areas, Ciba-Geigy will submit a certification that the facility has been closed in accordance with the specifications in the approved closure plan. This certification will be submitted to the MDNR and completed by a registered professional engineer and by Ciba-Geigy.

I-1b Final Closure of Facility

Ciba-Geigy plans to close all three storage areas at the East Lansing, Michigan facility according to 40 CFR Part 265, Resource Conservation Recovery Act (RCRA) requirements as referred to in State Act Rule 601(3)(a). After closure, the storage areas will be re-opened and managed as short-term (maximum 90 days) storage areas.

I-1c Maximum Waste Inventory

Table 1 identifies the inventory of hazardous wastes in each storage area based on inventory records and inspection reports.

I-1d(1) Inventory Removal

The complete inventory of drummed hazardous waste material will be removed and disposed of off site as indicated in I-1(f) as part of the closure plan.

I-1d(2) Closure of Storage Areas

General Investigation

Phase I of the closure plan will consist of visually inspecting all containment components inside each storage area including:

- a) concrete slabs
- b) surrounding areas
- c) masonry block walls
- d) joints and joint compound in the concrete

All cracks, discontinuities or possible releases will be noted and marked where they occur. Phase II of the closure will consist of filling/sealing any cracks or discontinuities found in Phase I.

If no cracks or discontinuities are found in the concrete or any or all the storage areas, then Phase II will be omitted from the particular area(s).

If during Phase I possible breeches are observed in any storage area, the Contingency Plan for Sediment Investigation (I-1d(3)) will be implemented.

Decontamination

Phase III of the closure plan consists of decontaminating the floors, wall and associated equipment. The concrete floors, walls and equipment in each area will be decontaminated by triple washing the surface with an industrial type rinse and vacuum

unit. A solution of trisodium phosphate (6 oz. per gallon of water) will be used in the first wash. The second wash will use a solution (2%) of muriatic acid. The third wash will use clean water. Samples of the raw final rinse water will be collected prior to use and analyzed for the parameters in Table 2.

Phase IV of the closure plan consists of collecting samples of the rinse waste from sumps developed for each area. All wash and rinse water will be stored in drums or in a tank prior to discharge to the publicly owned treatment works (POTW).

Two working days in advance of any closure activity the Waste Management Division, Lansing District staff (517-322-1300) and the Lansing Hazardous Waste Permits Section staff (517-373-2730) shall both be notified.

I-ld(3) Contingency Plan for Sediment Investigation.

If potential contamination breeches are observed in the concrete of any of the hazardous storage areas, additional investigation will be required. Coring will be required in any area suspected of being potential breeches. Once a core has been cut, sediment samples from beneath the breeched area (i.e., 6-inches below the concrete slab) will be collected. Background sediment samples from the same soil horizon) will be collected from outside the main building as indicated on Figure 1.

All sediment samples will be collected using stainless steel spoons which have been rinsed and cleaned with deionized water prior to use and wrapped to reduce the possibility of contamination. A separate clean spoon will be used for each sample. Samples will be collected in 850 ml glass jar with tops having a teflon liner. Sediment samples for volatile aromatics (USEPA Methods 601 and 602) will be collected utilizing the protocols outlined in EPA SW 846, third edition.

Sediment samples will be subjected to analytical testing for those parameters in Table 2. Table 2 also indicates the appropriate protocols and detection limits.

Utilizing the Cochran's approximation to the Behrens-Fisher Student T-Test, the analytical results from the storage area samples will be compared to background levels. If a storage area results are within the range of plus or minus three (3) standard deviations, it will be concluded that no significant impact has occurred as a result of the storage operation. If the results are outside this range sampling will be expanded to carry out additional investigation to insure the closure standards of 40 CFR 265.111 are met.

If no significant contamination is determined to exist in the cored areas, then the cores will be recemented and joint compound applied.

A small drilling/auger rig will be utilized to collect sediment samples at depth below the concrete. The same techniques will be employed for the collection of background sediment samples from the appropriate horizon.

I-1e Certification of Closure

Following the completion of the closure steps outlined previously and with the suitable implementation of the corrective actions as described, Ciba-Geigy will provide a certification that the hazardous waste storage areas have been closed in accordance with the approved closure plan. This certification will include the following items:

- certification statement by the owner/operator
- certification statement by an independent registered professional engineer
- site safety plan
- manifests (or manifest summary) for the shipment of all wastes generated by closure activities
- summary of decontamination procedures and wastewater disposal
- summary analysis of closure activities including time table, weather conditions, runoff controls, equipment decontamination, and sampling results, etc.
- statistical comparison of soil samples and background results
- sampling and analysis procedures
- properly labeled and easily identified sampling station map including background sampling stations
- a copy of the approved closure plan and letter of closure approval

I-1f Closure Cost Estimate

There are no plans to create a special closure trust fund for the hazardous waste storage areas. Ciba-Geigy has shown financial assurance for general clean-ups using the financial test. This has been submitted to the MDNR and is based on the following closure cost estimate:

Closure Costs:

Design capacity = 150 drums

Methods of disposal available - 1. Reclaim
2. Landfill
3. Incinerate

Current average costs of disposal by each method (including transportation)

1. Reclamation = \$ 150.00/drum
2. Landfill = \$ 250.00/drum
3. Incineration = \$ 1,000.00/drum

If there are 150 drums at the facility, the normal breakdown of waste types by disposal methods would be:

Reclamation	=	30 drums	@	\$ 150.00/drum	\$	4,500.00
Landfill	=	80 drums	@	\$ 250.00/drum	\$	20,000.00
Incineration	=	40 drums	@	\$ 1,000.00/drum	\$	<u>40,000.00</u>

Disposal Costs \$ 64,500.00

Cleanup Contractor= \$ 25,500.00

+20% \$ 90,000.00
\$ 18,000.00

108,000.00

I-1g Closure Schedule

A schedule for the activities associated with the closure of each waste storage area is attached as Figure 2.

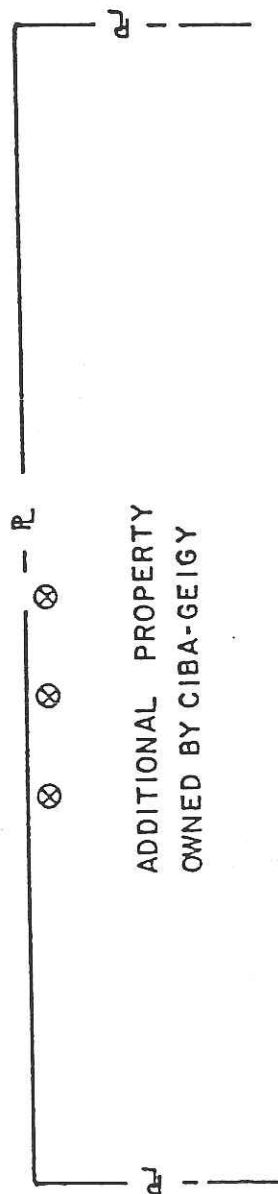
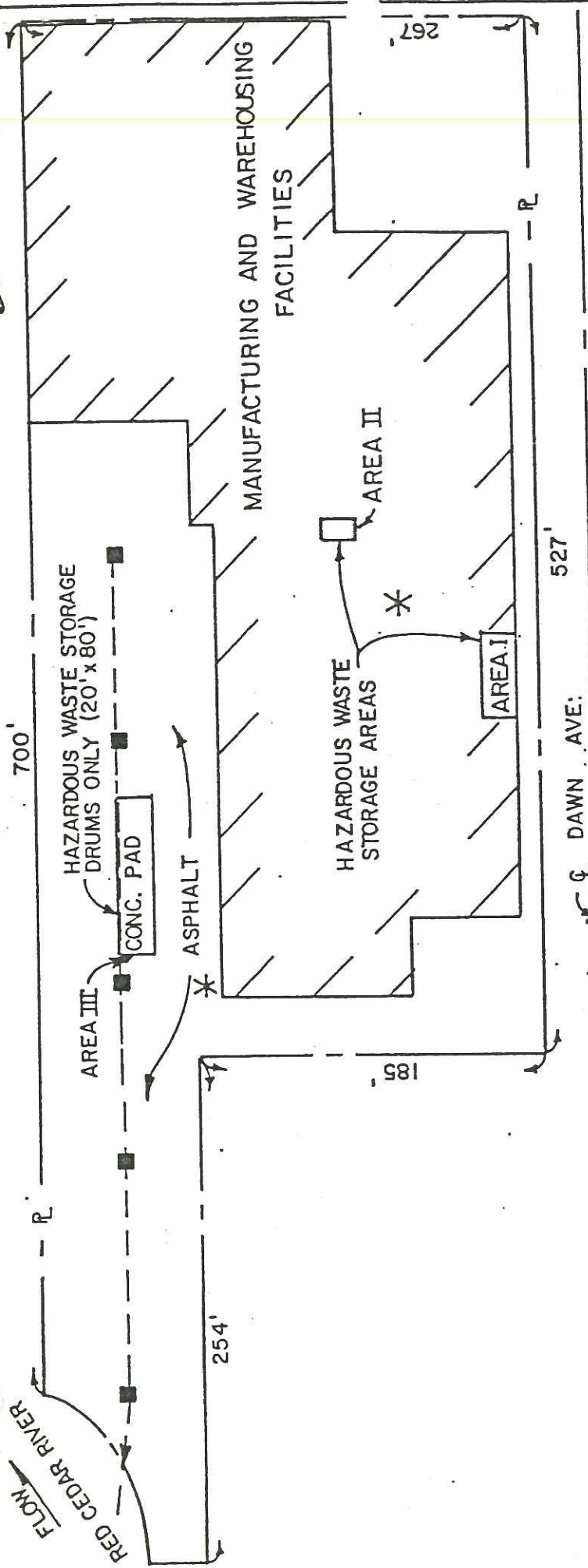
TABLE 1

WASTE MATERIALS STORED
IN HAZARDOUS WASTE STORAGE AREAS

<u>Waste Materials</u>	<u>Hazardous Waste Number</u>	<u>Contaminating Material</u>
HAZARDOUS WASTE STORAGE AREA I		
a. Liquid Polyol	D009	Mercury
b. Solid Polyol (paste)	D009	Mercury
c. Halogenated Solvents	F002; D001	Ignitable Halo- genated Solvents
HAZARDOUS WASTE STORAGE AREA II		
a. Flammable Rags	D001, F005	Ignitable, Non- Halogenated Solvents (Toluene)
b. Spent Solvents	D001, F005	Ignitable, Non Halogenated (Toluene)
HAZARDOUS WASTE AREA III		
a. Flammable Rags	D001, F005	Ignitable, Non- Halogenated Solvents (Toluene)
b. Halogenated	F002, (D001)	Ignitable, Halogenated Solvents
c. Liquid Polyol	D009	Mercury
d. Solid Polyol (paste)	D009	Mercury
e. Flammable	D001	Ignitable
f. Spent Solvents	F005	Non-Halogenated Solvents (Toluene)

TABLE 2
SCHEDULE OF ANALYTICAL TESTING

<u>Parameter</u>	<u>Anticipated Detection Limit (ppm)</u>	<u>SW846 No.</u>
HAZARDOUS WASTE STORAGE AREA I		
a. Mercury	0.001	7470 or 7471
b. Flash Point	-	1010
c. Purgeable Halocarbons (EPA 601)	.03 - .1	8010 with purge and trap Method 5030
HAZARDOUS WASTE STORAGE AREA II		
a. Flash Point	-	1010
b. Volatile aromatics (toluene)	.03 - .1	8020
c. Purgeable Halocarbons (EPA 601)	.03 - .1	8010 with purge and trap Method 5030
HAZARDOUS WASTE STORAGE AREA III		
a. Mercury	0.001	7470 or 7471
b. Flash Point	-	1010
c. Volatile Aromatics	.03 - .1	8020
d. Purgeable Halocarbons (EPA 601)	.03 - .1	8010 with purge and trap Method 5030



LEGEND

- ⊗ PROPOSED BACKGROUND SEDIMENT SAMPLE LOCATION
- * AREA TELEPHONE LOCATION
- APPROXIMATE LOCATION OF STORM SEWER AND CATCH BASINS

ADDITIONAL PROPERTY OWNED BY CIBA-GEIGY



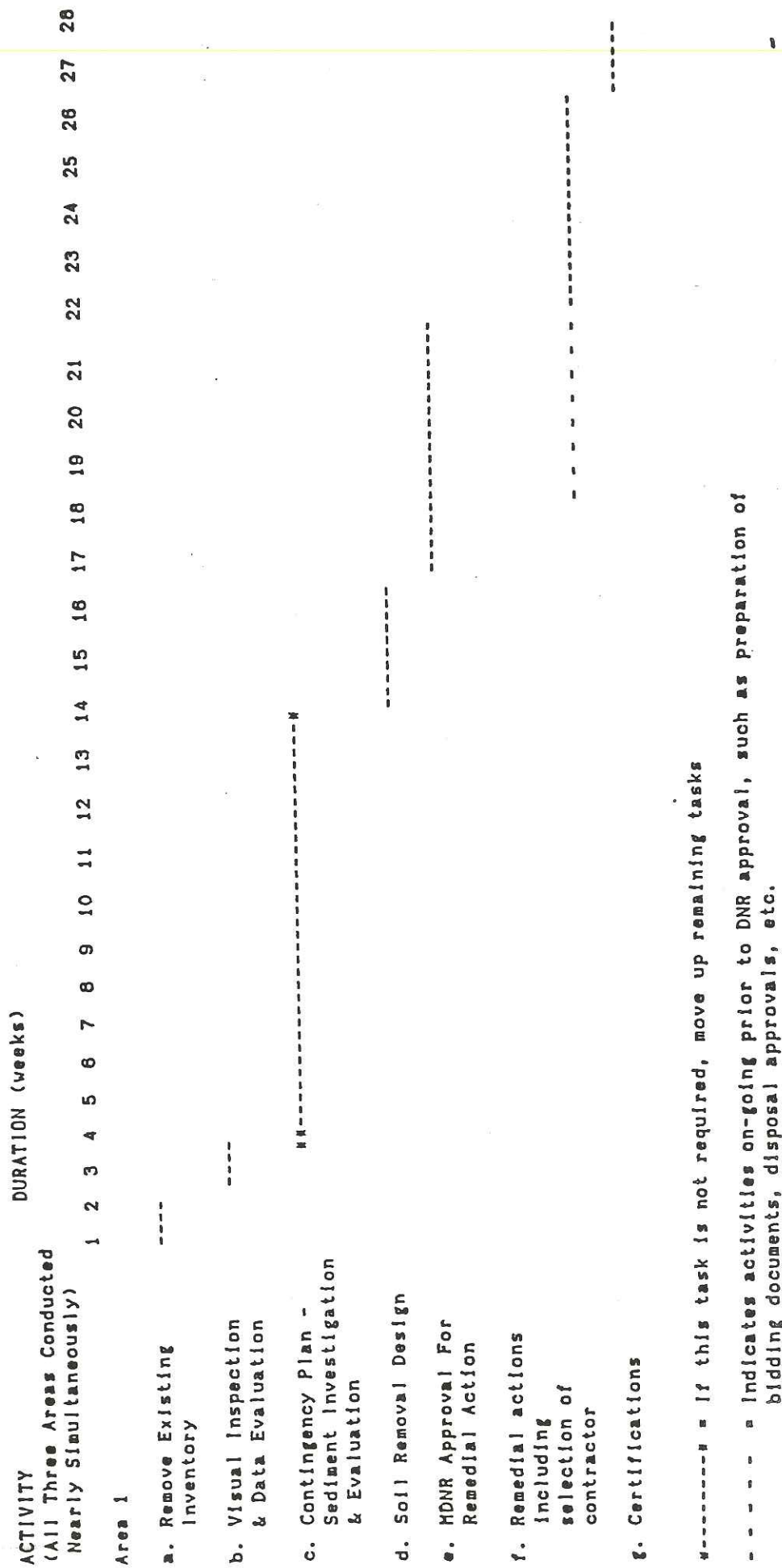
CIBA-GEIGY CORP.
EAST LANSING, MICHIGAN

GENERAL SITE PLAN

NO SCALE

FIGURE 1

FIGURE 2 - CLOSURE SCHEDULE - THREE HAZARDOUS WASTE STORAGE AREAS





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

24 SEP 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dennis Drake, Chief
Compliance Enforcement Section
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Dear Mr. Drake:

The purpose of this letter is to forward six files which contain financial information which was claimed to be confidential business information under 40 CFR 260.2(b). Since the Michigan Department of Natural Resources (MDNR) received authorization for the financial responsibility requirements of 40 CFR Part 264 and 265 on October 30, 1986, we are transferring the original documents for use in your reviews.

The six files being forwarded are as follows:

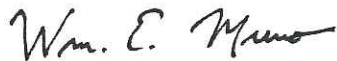
- | | |
|--|-----------------|
| 1. BASF Corporation (Holland, MI) | MID 006 411 953 |
| 2. BASF Corporation (Holland, MI) | MID 048 223 986 |
| 3. BASF Corporation (Troy, MI) | MID 057 007 478 |
| 4. BASF Corporation (Wyandotte, MI) | MID 064 197 742 |
| 5. CIBA-GEIGY Corp. (East Lansing, MI) | MID 067 352 989 |
| 6. Michigan Waste Systems (Wayne, MI) | MID 000 810 408 |
| - Woodland Meadows Landfill | |

Except for letters of credit, these six files complete the transfer of financial responsibility documents to MDNR. Because the Regional Administration is named as the benefactor in letters of credit, it was previously agreed that letters of credit would be handled individually with each lending institution. Copies of these letters of credit were forwarded

to the MDNR on March 13, 1987. Region V is to retain the originals until the MDNR contacts the lending institutions and informs Region V as to the appropriate procedure for transferring each letter of credit.

If you have any questions, please contact Ronald Brown of my staff at (312) 886-4463.

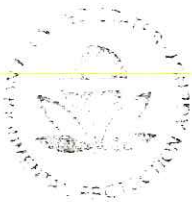
Sincerely yours,

A handwritten signature in cursive script, reading "Wm. E. Muno".

William E. Muno, Chief
RCRA Enforcement Section

Enclosures

cc: Alan Howard



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HE-12

April 7, 1987

J. Stewart Johnson, Manager
Hazardous Materials Safety,
Health & Ecology
CIBA-GEIGY Corporation
Ren Plastic Division
Post Office Box 23037
Lansing, Michigan 48909

Re: RCRA Financial Responsibility

Dear Mr. Johnson:

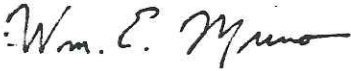
On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of the United States Environmental Protection Agency (U.S. EPA) to administer a hazardous waste program in lieu of the Federal program. As a result of final authorization, Michigan is required to enforce the provisions of the Resource Conservation and Recovery Act (RCRA). One of these provisions (40 CFR Part 265, Subpart H) requires all hazardous waste facilities to demonstrate financial responsibility for liability coverage and closure/post-closure care.

U.S. EPA may disclose confidential information to authorized representatives, i.e., those state or local governmental agencies which have duties or responsibilities under RCRA or under regulations which implement RCRA. These disclosures are authorized pursuant to 40 CFR 2.305(h)(3).

On March 25, 1986, CIBA-GEIGY Corporation submitted financial information which was claimed as confidential by CIBA-GEIGY Corporation. This letter is to notify you of the transfer of this document to the State of Michigan pursuant to 40 CFR 2.305(h)(3)(iii).

If you should have any questions regarding this matter, please contact Sharon R. Johnson at (312) 886-4581 or Ronald Brown at (312) 353-7921.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Wm. E. Muno". The signature is fluid and cursive, with a long horizontal stroke at the end.

William E. Muno, Chief
RCRA Enforcement Section

cc: John Bohunsky, MDNR

175 Water Street
New York, NY 10038
(212) 701-0200

January 20, 1986



U.S. EPA, Region V
Waste Management Branch
230 S. Dearborn Street
Chicago, Illinois 60604

RECEIVED
JAN 24 1986
SOLID WASTE BRANCH
U.S. EPA, REGION V

Gentlemen:

In accordance with the Hazardous Waste Facility Certificate of Pollution Liability Insurance filed with you, copy attached, notice of non-renewal is hereby given for the Pollution Liability Insurance for bodily injury and property damage coverage for sudden and non-sudden accidental occurrences for the following:

Insured: Ciba-Geigy Corporation

Facility: 4917 Dawn Avenue
East Lansing, Michigan 48823
E.P.A. ID: MIDO 67352989

Policy Effective Date: 7/15/82

Signed:

Kevin McCracken
Account Manager/INA Special Risk
175 Water Street
New York, NY 10038

KM:cg

cc: Michigan Dept. of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Ms. Marianne Caruana
Marsh & McLennan, Inc.
1221 Avenue of the Americas
New York, New York 10020

RECEIVED
Policy No.: PLI 01126
JAN 30 1986

RECEIVED
JAN 28 1986
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH
SOLID WASTE BRANCH
U.S. EPA, REGION V

RECEIVED
JAN 24 1986

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

CIBA-GEIGY Corporation

Ardsley, New York 10502
Telephone 914 478 3131

MID 647 352 97-1
CIBA-GEIGY

April 24, 1985

RECEIVED
REGISTERED MAIL
RETURN RECEIPT REQUESTED

APR 30 1985

Mr. Basil Constantelos
Director, Waste Management Branch
U.S. EPA Region V
230 South Dearborn Street
Chicago, ILL 60606

SOLID WASTE BRANCH
U.S. EPA, REGION V

Re: RCRA Financial Requirements Annual Revision 1985- Financial Test
For Closure and Post-Closure - Ren Plastics, MI - MID067352989

Dear Mr. Constantelos:

Enclosed are financial documents from CIBA-GEIGY Corporation. Two complete sets of documents are included with this package. Set 1 is considered Confidential Business Information and has been so identified on the original signature copy. Set 2, for public record has the Confidential Business Information deleted.

The documentation demonstrates that CIBA-GEIGY Corporation continues to satisfy the requirements of the Financial Test Mechanism for Closure and Post-Closure coverage of its treatment, storage and disposal facilities, based on the year ending 1984.

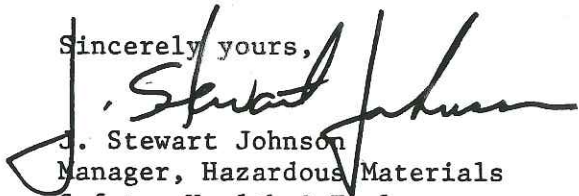
CIBA-GEIGY owns and/or operates eight facilities which utilize the Financial Test Option to demonstrate financial coverage for Closure and Post-Closure cost under RCRA regulations.

CIBA-GEIGY Corporation is unlike US publically-held corporations which are geared to the 90-day reporting requirements of the SEC. CIBA-GEIGY is a wholly-owned subsidiary of CIBA-GEIGY Limited, Basle, Switzerland. Historically, auditing practices for CIBA-GEIGY have been geared to a 120-day loan covenant schedule. I have been in contact with our Treasurer's Department concerning the annual updating requirement as specified in Parts 265.143(e)(5) and 265.145(e)(5) for the Financial Test and have been assured that CIBA-GEIGY's certified financial statements are completed no later than April 30 each year.

In a letter to your office dated March 6, 1984, I explained CIBA-GEIGY's yearly independent auditing practices and requested an extension to April 30 for document submission for 1984 and future years. The Financial Test option under RCRA remains a viable mechanism to cover projected Closure and Post-Closure cost for the Corporation's TSD facilities.

If there are questions or if I can supply additional information, please do not hesitate to contact me at 914-478-3131, extension 2028.

Sincerely yours,


J. Stewart Johnson
Manager, Hazardous Materials
Safety, Health & Ecology

SJ:gg
Enc.

SET 2

PUBLIC RECORD

COPY

Letter From Chief Financial Officer

I am the chief financial officer of CIBA-GEIGY Corporation, 444 Saw Mill River Road, Ardsley, New York 10502. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility (see Exhibit 1).
2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Part 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility (see Exhibit 1).
4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H or 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility (see Exhibit 1).

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 28. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 28, 1984.

1. Sum of current closure and post-closure cost estimates
(total of all cost estimates shown in the four paragraphs
above)

\$22,591,166

*2. Total liabilities (if any portion of the closure or post-
closure cost estimates is included in total liabilities,
you may deduct the amount of that from this line and add
that amount to line 3 and 4)

**3. Tangible net worth

*4. Net worth

*5. Current assets

*6. Current liabilities

*7. Net working capital (line 5 minus line 6)

*8. The sum of net income plus depreciation, depletion,
and amortization

*9. Total assets in U.S. (required only if less than 90% of
firm's assets are located in the U.S.)

10. Is line 3 at least \$10 million?

11. Is line 3 at least 6 times line 1?

12. Is line 7 at least 6 times line 1?

*13. Are at least 90% of firm's assets located in the U.S.?
If not, complete line 14.

14. Is Line 9 at least 6 times line 1?

15. Is line 2 divided by line 4 less than 2.0?

16. Is line 8 divided by line 2 greater than 0.1?

17. Is line 5 divided by line 6 greater than 1.5?

*Denotes figures derived from financial statements.

I hereby certify that the wording of this letter is identical to the wording
specified in 40 CFR 264.151(f), as such regulations were constituted on the date
shown immediately below.

Signature: Richard Barth

Name: Richard Barth

Title: Senior Vice President - Finance and General Counsel

Dated: 4/22/85

** Net Worth -	Per Audited Balance Sheet	819,134,000
Less Goodwill	" " " "	- 32,625,000
Less Other Intangibles Included In	" "	- 22,324,000

Total Tangible Net Worth

764,185,000

EXHIBIT 1

FINANCIAL TEST INSTRUMENT
CLOSURE AND POST-CLOSURE COST

- APPENDIX A Facilities Under Federal Jurisdiction
- APPENDIX B Facilities Under State Jurisdiction
- APPENDIX C Facilities Not Covered Under This or Any
 Other Financial Instrument

APPENDIX A

FACILITIES UNDER FEDERAL JURISDICTION

<u>REGION</u>	<u>ADDRESS</u>	<u>EPA ID#</u>	<u>\$ CLOSURE</u>	<u>\$ POST-CLOSURE</u>	<u>\$ TOTAL</u>
V	CIBA-GEIGY Corporation 4917 Dawn Avenue East Lansing, MI 48823	MID067352989	34,529	0	34,529
		TOTAL \$	34,529	0	34,529

APPENDIX B

FACILITIES UNDER STATE JURISDICTION

<u>REGION</u>	<u>STATE</u>	<u>ADDRESS</u>	<u>EPA ID#</u>	<u>\$ CLOSURE</u>	<u>\$ POST-CLOSURE</u>	<u>\$ TOTAL</u>
I	RI	CIBA-GEIGY Corporation 180 Hill Street Cranston, RI 02905	RID001194342	188,525	0	188,525
II	NY	CIBA-GEIGY Corporation Lower Warren Street Glens Falls, NY 12801	NYD002069748 NYD098334618 NYD000818419	867,120	35,100	902,220
II	NY	CIBA-GEIGY Corporation P. O. BOX 100 Suffern, NY 10901	NYD013238480	21,934	0	21,934
III	PA	Drakenfeld Colors West Wylie Avenue P.O. BOX 519 Washington, PA 15301	PAD041731670	28,500	0	28,500
IV	AL	CIBA-GEIGY Corporation P.O. BOX 113 McIntosh, AL 36553	ALD001221902	20,300,000	132,428	20,432,428
VI	LA	CIBA-GEIGY Corporation P.O. BOX 11 St. Gabriel, LA 70776	LAD053783445	938,030	14,000	952,030
IX	CA	CIBA-GEIGY Corporation 18095 Mt. Shay Avenue Fountain Valley, CA 92708	CAD980695944	31,000	0	31,000
TOTAL \$				22,375,109	181,528	22,556,637

APPENDIX C

FACILITIES NOT COVERED UNDER THIS OR ANY OTHER FINANCIAL INSTRUMENT

<u>REGION</u>	<u>STATE</u>	<u>ADDRESS</u>	<u>EPA ID#</u>	<u>\$ CLOSURE</u>	<u>\$ POST-CLOSURE</u>	<u>\$ TOTAL</u>
---------------	--------------	----------------	----------------	-------------------	------------------------	-----------------

NONE

To the Board of Directors
CIBA-GEIGY Corporation:

We have examined the consolidated balance sheet of CIBA-GEIGY CORPORATION and SUBSIDIARIES ("the Company") as of December 28, 1984 and the related consolidated statements of income and retained earnings and changes in financial position for the year then ended and have issued our report thereon dated March 15, 1985. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the report of Mr. Richard Barth, Senior Vice President and Chief Financial Officer of the Company to the Director, Waste Management Branch, U.S. Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60606. We have also compared items 2 through 9 and item 13 of Alternative I in such report to information derived from the audited consolidated financial statements of the Company as of and for the year ended December 28, 1984.

In connection with the procedures referred to in paragraph 2 above, no matters came to our attention that caused us to believe that the specified items should be adjusted.

This letter is solely for the information of the Company and the Director, Waste Management Branch, U.S. Environmental Protection Agency, Region V, and its use is restricted to such parties.



Three Landmark Square
Stamford, Connecticut 06904
April 16, 1985

CIBA-GEIGY CORPORATION

Consolidated Financial Statements
as of December 28, 1984 and December 30, 1983

Coopers
& Lybrand

Certified Public Accountants

To the Board of Directors
CIBA-GEIGY Corporation:

We have examined the consolidated statements of financial position of CIBA-GEIGY CORPORATION and SUBSIDIARIES as of December 28, 1984 and December 30, 1983 and the related consolidated statements of income and retained earnings and changes in financial position for the years then ended. Our examinations were made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

In our opinion, the financial statements referred to above present fairly the consolidated financial position of CIBA-GEIGY Corporation and Subsidiaries at December 28, 1984 and December 30, 1983 and the consolidated results of their operations and changes in their financial position for the years then ended, in conformity with generally accepted accounting principles applied on a consistent basis.



Three Landmark Square
Stamford, Connecticut 06904
March 15, 1985.

CIBA-GEIGY Corporation
Ardsley, New York 10502
Telephone 914 478 3131

To Part A files 4063
CIBA-GEIGY
MID 067 352 989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 8, 1983

Regional Administrator
US EPA REGION V
Attention: RCRA Financial Requirements
P. O. Box A3587
Chicago, Illinois 60690-3587

Dear Sir:

In July 1982, CIBA-GEIGY Corporation established a Trust Fund Agreement and an Irrevocable Standby Letter of Credit to meet RCRA financial requirements for TSD facilities. Since the original issuance, a number of states have received Interim Authority and two of our sites have withdrawn their status as TSD facilities.

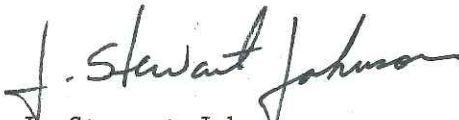
Please find enclosed two revised copies of Schedule A which should replace those originally issued in the Trust Agreement and Letter of Credit. At this time, the aggregate dollar amount specified in the Letter of Credit will remain unchanged. CIBA-GEIGY is presently reviewing the various financial options available under RCRA to establish which mechanism may be used to meet future requirements.

Reference:

Letter of Credit No. 017133
Facility
CIBA-GEIGY Corporation
4917 Dawn Avenue
East Lansing, MI 48823
EPA ID MID067352989

PA, E, TRS, TSD, PAS 1

Yours truly,



J. Stewart Johnson
Manager, Hazardous Wastes

JSJ:gg
Enc.

cc: R. Curran
M. Munsell
R. Naidus
R. Sahgal

RECEIVED

FEB 16 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

SCHEDULE 'A'

Page 1 of 2

<u>REGION</u>	<u>ADDRESS</u>	<u>EPA ID #</u>	<u>\$ CLOSURE</u>
I	CIBA-GEIGY Corporation 180 Mill Street Cranston, RI 02905	RID001194342	\$ 373,000
II	CIBA-GEIGY Corporation Lower Warren Street Glens Falls, NY 12801	NYD002069748 NYD098334618 NYD000818419	689,500 26,330 post-closure
	CIBA-GEIGY Corporation P.O. Box 100 Suffern, NY 10901	NYD013238480	22,000
	CIBA-GEIGY Corporation 556 Morris Avenue Summit, NJ 07901	NJD001316173	20,000
	CIBA-GEIGY Corporation P.O. Box 71 Toms River, NJ 08753	NJD001502517	139,000
V	CIBA-GEIGY Corporation 4917 Dawn Avenue East Lansing, MI 48823	MID067352989	26,000
Total Closure			\$ 1,269,500
Total Post-Closure			\$ 26,330
Required coverage			\$ 1,295,830
Total Letter of Credit			<u>\$14,838,000</u>

SCHEDULE 'A'

<u>REGION</u>	<u>ADDRESS</u>	<u>EPA ID #</u>	<u>\$ CLOSURE</u>
I	CIBA-GEIGY Corporation 180 Mill Street Cranston, RI 02905	RID001194342	\$ 373,000
II	CIBA-GEIGY Corporation Lower Warren Street Glens Falls, NY 12801	NYD002069748 NYD098334618 NYD000818419	689,500 26,330 post-closure
	CIBA-GEIGY Corporation P.O. Box 100 Suffern, NY 10901	NYD013238480	22,000
	CIBA-GEIGY Corporation 556 Morris Avenue Summit, NJ 07901	NJD001316173	20,000
	CIBA-GEIGY Corporation P.O. Box 71 Toms River, NJ 08753	NJD001502517	139,000
V	CIBA-GEIGY Corporation 4917 Dawn Avenue East Lansing, MI 48823	MID067352989	26,000
Total Closure			\$ 1,269,500
Total Post-Closure			\$ 26,330
Required coverage			\$ 1,295,830
Total Letter of Credit			<u>\$14,838,000</u>



Irving Trust

Irving Trust Company
One Wall Street
New York, NY 10015

7

Our Number 017133	Correspondent's/Customer's Number	Advising Bank's Number	Date March 9, 1984
Advising Bank		Applicant Ciba-Geigy Corporation 444 Saw Mill River Road Ardsley, New York 10502	
Beneficiary Regional Administrator U.S. Environmental Protection Agency		Correspondent	

Gentlemen:

The above mentioned instrument, including any previous amendments, is amended as follows:

Drafts must clearly specify the number of this credit and be presented at this company no later than July 6, 1985.

All other terms and conditions remain unchanged.

The advising bank is requested to notify the beneficiary of this amendment.

This amendment is to be considered as part of the above credit and must be attached thereto.

Very Truly Yours,

Authorized Signature

Advising Bank's Notification

RECEIVED
MAR 16 1984
**WASTE MANAGEMENT
BRANCH**

Place date, name and signature of the advising bank

CIBA-GEIGY Corporation
Ardsley, New York 10502
Telephone 914 478 3131

MD 067352989
CIBA-GEIGY

March 6, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Basil Constantelos
Director, Waste Management Division
U.S. EPA Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED
MAR 15 1984

**WASTE MANAGEMENT
BRANCH**

Re: CIBA-GEIGY Corporation EPA ID NO. 067 352 989 REN PLASTICS FACILITY
4917 Dawn Avenue
East Lansing, Michigan 48823

Dear Mr. Constantelos:

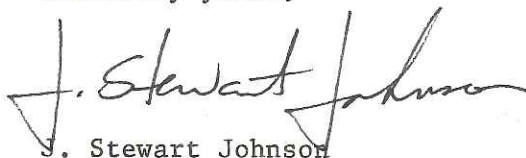
CIBA-GEIGY Corporation owns and/or operates 13 facilities which are required to demonstrate financial coverage for Closure and Post-Closure under RCRA. Initially this demonstration was through the Letter of Credit option. In a review of available financial mechanisms, the Financial Test was chosen and replaced the Letter of Credit in June 1983.

CIBA-GEIGY Corporation is unlike US publically-held corporations which are geared to the 90-day reporting requirements of the SEC. CIBA-GEIGY Corporation is a wholly-owned subsidiary of CIBA-GEIGY Limited, Basle, Switzerland. Historically, auditing practices for CIBA-GEIGY have been geared to a 120-day loan covenant schedule. I have been in contact with our Treasurer's Department concerning the annual updating requirement as specified in Parts 265.143(e)(5) and 265.145(e)(5) for the Financial Test and have been assured that CIBA-GEIGY's certified financial statements are completed no later than April 30 each year.

I would like to request an extension to April 30 beginning in 1984 and in future years for the submission of the documents which will demonstrate that the Financial Test option under RCRA is still a viable mechanism to cover projected Closure and Post-Closure cost for the Corporation's TSD facilities.

If there are questions or if I can supply additional information, please do not hesitate to contact me at 914-478-3131, extension 2028. I look forward to hearing from you at your earliest convenience.

Sincerely yours,


J. Stewart Johnson

Manager, Hazardous Materials

JSJ:gg:(01)

RECEIVED

MAR 15 1984

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
OFFICE OF THE DIRECTOR

To the Board of Directors
CIBA-GEIGY Corporation:

We have examined the consolidated balance sheet of CIBA-GEIGY CORPORATION and SUBSIDIARIES ("the Company") as of December 31, 1982 and the related consolidated statements of income and retained earnings and changes in financial position for the year then ended and have issued our report thereon dated March 14, 1983. Our examination was made in accordance with generally accepted auditing standards and, accordingly, included such tests of the accounting records and such other auditing procedures as we considered necessary in the circumstances.

We have read the report of Mr. Richard Barth, Senior Vice President and Chief Financial Officer of the Company to the Regional Administrator, U.S. Environmental Protection Agency, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. We have also compared items 2 through 9 and item 13 of Alternative I in such report to information derived from the audited consolidated financial statements of the Company as of and for the year ended December 31, 1982.

In connection with the procedures referred to in paragraph 2 above, no matters came to our attention that caused us to believe that the specified items should be adjusted.

This letter is solely for the information of the Company and the Regional Administrator, U.S. Environmental Protection Agency, Region V, and its use is restricted to such parties.

Coopers & Lybrand

Three Landmark Square
Stamford, Connecticut 06904
May 12, 1983.

Richard Barth, Senior Vice President
Chief Financial Officer & General Counsel

CIBA-GEIGY

CIBA-GEIGY Corporation
Ardsley, New York 10502
Telephone 914 478 3131

June 3, 1983

Mr. Thomas Golz
EPA Region V
Waste Management Branch
230 S. Dearborn Street
Chicago, IL 60604

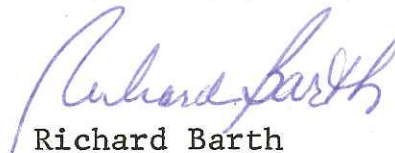
Subject: RCRA Financial Requirements - Financial Test
For Closure and Post-Closure

Dear Mr. Golz:

Please find enclosed the documentation demonstrating that CIBA-GEIGY Corporation satisfies the requirements of the Financial Test Mechanism for Closure and Post-Closure coverage of its treatment, storage, and disposal facilities.

If you have questions concerning this information, please do not hesitate to contact me at 914-478-3131.

Very truly yours,


Richard Barth

RB:bc
Enc.

Letter From Chief Financial Officer

I am the chief financial officer of CIBA-GEIGY Corporation, 444 Saw Mill River Road, Ardsley, New York 10502. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility in Appendix A.
2. This firm guarantees, through the corporate guarantee specified in Subpart H of 40 CFR Parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by subsidiaries of this firm. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None.
3. In States where EPA is not administering the financial requirements of Subpart H of 40 CFR Parts 264 and 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of 40 CFR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility: In Appendix B.
4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of 40 CFR Parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility in Appendix C.

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year ended December 31, 1982.

ALTERNATIVE 1

1. Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)	
*2. Total liabilities (if any portion of the closure or post-closure cost estimates is included in total liabilities, you may deduct the amount of that from this line and add that amount to lines 3 and 4)	\$ 15,724,864
*3. Tangible net worth	\$ 800,233,000
*4. Net worth	\$ 634,343,000
*5. Current assets	\$ 692,468,000
*6. Current liabilities	\$ 781,011,000
*7. Net working capital (line 5 minus line 6)	\$ 403,257,000
*8. The sum of net income plus depreciation, depletion, and amortization	\$ 377,754,000
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)	\$ 154,858,000
	Not Applicable
	YES NO
10. Is line 3 at least \$10 million?	X
11. Is line 3 at least 6 times line 1?	X
12. Is line 7 at least 6 times line 1?	X
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.	X
14. Is line 9 at least 6 times line 1?	Not Applicable
15. Is line 2 divided by line 4 less than 2.0?	X
16. Is line 8 divided by line 2 greater than 0.1?	X
17. Is line 5 divided by line 6 greater than 1.5?	X

*Denotes figures derived from financial statements.

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.

Signature: Richard Barth

Name: Richard Barth

Title: Senior Vice President - Finance and General Counsel

Dated: 6/3/83

APPENDIX A

FACILITIES UNDER FEDERAL JURISDICTION

<u>REGION</u>	<u>ADDRESS</u>	<u>EPA ID#</u>	<u>\$ CLOSURE</u>	<u>\$ POST-CLOSURE</u>	<u>\$ TOTAL</u>
II	CIBA-GEIGY Corporation Lower Warren Street Glens Falls, NY 12801	NYD002069748 NYD098334618 NYD000818419	889,000	26,300	915,300
II	CIBA-GEIGY Corporation P.O. Box 100 Suffern, NY 10901	NYD013238480	19,008	0	19,008
V	CIBA-GEIGY Corporation 4917 Dawn Avenue East Lansing, MI 48823	MID067352989	26,000	0	26,000
	TOTAL \$		934,008	26,330	960,308

APPENDIX B

FACILITIES UNDER STATE JURISDICTION

<u>REGION</u>	<u>STATE</u>	<u>ADDRESS</u>	<u>EPA ID#</u>	<u>\$ CLOSURE</u>	<u>\$ POST-CLOSURE</u>	<u>\$ TOTAL</u>
I	RI	CIBA-GEIGY Corporation 180 Hill Street Cranston, RI 02905	RID001194342	419,000	0	419,000
II	NJ	CIBA-GEIGY Corporation 556 Morris Avenue Summit, NJ 07901	NJD001316173	25,456	0	25,456
II	NJ	CIBA-GEIGY Corporation P.O. Box 71 Toms River, NJ 08753	NJD001502517	157,300	0	157,300
III	PA	Drakenfield Colors West Wylie Avenue P.O. Box 519 Washington, PA 15301	PAD041731670	22,800	0	22,800
IV	NC	CIBA-GEIGY Corporation 410 Swing Road Greensboro, NC 27419	NCD061801361	80,000	0	80,000
IV	AL	CIBA-GEIGY Corporation P.O. Box 113 McIntosh, AL 36553	ALD001221902	13,433,000	82,000	13,515,000
VI	LA	CIBA-GEIGY Corporation P.O. Box 11 St. Gabriel, LA 70776	LAD053783445	295,000	0	295,000
TOTAL \$				14,432,556	82,000	14,514,556

APPENDIX C

FACILITIES NOT COVERED UNDER THIS OR ANY OTHER FINANCIAL INSTRUMENT

<u>REGION</u>	<u>STATE</u>	<u>ADDRESS</u>	<u>EPA ID#</u>	<u>\$ CLOSURE</u>	<u>\$ POST-CLOSURE</u>	<u>\$ TOTAL</u>
III	PA	American Color & Chemical P.O. Box 51 Reading, PA 19604	PAD002329365	250,000	0	250,000
TOTAL \$				250,000	0	250,000

CIBA-GEIGY Corporation

Ardsley, New York 10502
Telephone 914 478 3131

CIBA-GEIGY

M1A067352989

June 3, 1983

Mr. Thomas Golz
EPA Region V
Waste Management Branch
230 S. Dearborn St.
Chicago, IL 60604

Re: RCRA Financial Assurance For Closure and Post-Closure

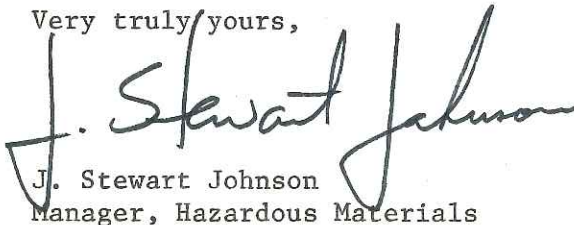
Dear Mr. Golz:

In July of 1982, CIBA-GEIGY Corporation submitted a Letter of Credit Number 017133 and Standby Trust Fund Agreement as the financial mechanism to demonstrate Closure and Post-Closure coverage for its TSD facilities. Since the issuance of the documents, CIBA-GEIGY has closely studied the other available financial options specified in the Federal Register of April 7, 1982. Based on that study, it is CIBA-GEIGY's desire to change financial assurance mechanisms from the Letter of Credit/Standby Trust Fund to the financial test.

Please find enclosed the documentation for the financial test as specified in the April 7, 1982 Federal Register. It is my understanding that approval of this change is required prior to financial mechanism substitution. Once approval has been granted, CIBA-GEIGY intends to revoke the existing Letter of Credit Number 017133 and the Standby Trust Fund Agreement.

As can be seen from the enclosed documentation, CIBA-GEIGY Corporation satisfies the requirements of the financial test as defined under RCRA. If you have questions or need additional information, please do not hesitate to call me at 914-478-3131, extension 2028. I look forward to hearing from you at your earliest convenience.

Very truly yours,


J. Stewart Johnson
Manager, Hazardous Materials

JSJ:gg
Enc.

RECEIVED
JUN 08 1983

WASTE MANAGEMENT
BRANCH



**INSURANCE COMPANY OF NORTH AMERICA
GROUP OF INSURANCE COMPANIES**

(This Certificate of Insurance neither affirmatively nor negatively amends, extends or alters the coverage, limits, terms or conditions of the policies it certifies.)

**HAZARDOUS WASTE FACILITY
CERTIFICATE OF POLLUTION LIABILITY INSURANCE**

1. Insurance Company of North America, (the Insurer) of
1600 Arch Street Philadelphia, PA, hereby certifies that it has issued
pollution liability insurance covering bodily injury and property damage to Ciba-Geigy Corporation

(the Insured), of 444 Saw Mill River Road, Ardsley, NY 10502, in connection
with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at

Ciba-Geigy Corp., 4917 Dawn Ave., Lansing Mich. 48823 MID067352989

for Sudden and Non Sudden Accidental Occurrences

The limits of liability are \$ 4,000,000 and \$ 8,000,000 annual aggregate,
exclusive of legal defense costs. The coverage is provided under policy number PL101126 issued on 7/15/82.
The effective date of said policy is 7/15/82.

The insurance hereby certified is either primary or excess insurance, as indicated by "X" for the limits shown:

☒ The insurance hereby certified is primary and the Insurer shall not be liable for amounts in excess of
\$ 4,000,000, \$ 8,000,000 annual aggregate, exclusive of legal defense costs.

☐ The insurance hereby certified is excess and the Insurer will not be liable for amounts in excess of
\$ _____, \$ _____ annual aggregate, exclusive of legal defense costs,
in excess of the underlying limits of \$ _____.

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
- (b) The primary Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
- (c) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151 (j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Barbara Gard
(Signature of authorized representative of Insurer)

Account Executive

(Title), Authorized Representative of

127 John Street New York, New York 10038

(Address of Representative)

Barbara Gard

(Type name)

Insurance Company of North America

(name of Insurer)



4917 Dawn Avenue
East Lansing, Michigan 48823
Telephone 517 351-5900

a CIBA-GEIGY Company

July 19, 1982

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Regional Administrator
U. S. Environmental Protection Agency
Attn: RCRA Financial Requirements
Box A3587
Chicago, IL 60690-3587

Dear Sir or Madam:

Please find enclosed a Certificate of Insurance document for:

CIBA-GEIGY Corporation
MID 067352989
4917 Dawn Avenue
East Lansing, MI 48823

This certificate is for both sudden and non-sudden occurrences.
Please feel free to contact me if you have any questions concerning
this matter.

Very truly yours,

A handwritten signature in black ink that reads "Michael L. Munsell". The signature is written in a cursive, flowing style.

Michael L. Munsell
Industrial Health/Safety Coordinator

MLM/ig
6/B-20



Irving Tru

Irving Trust Company
Letter of Credit Group
One Wall Street
New York, N.Y. 10015

Date September 28, 1983

• Regional Administrators - See Schedule A
Regions - See Schedule A
U.S. Environmental Protection Agency

Credit No.: 017133
Account: Ciba-Geigy Corporation

Gentlemen:

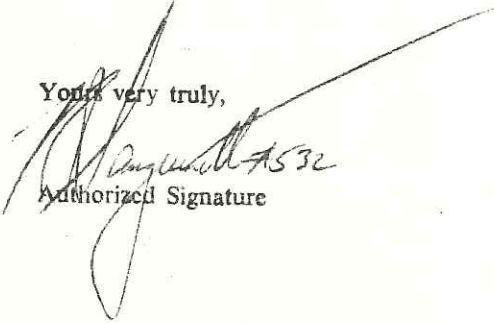
Customer

We are in receipt of a communication from our ~~correspondent~~ requesting us to:

- ☐ Reissue this credit in favor of another beneficiary.
- ☒ Cancel this credit.

In order that we may comply with their instructions, please indicate your agreement to the cancellation of this credit by signing the attached copy of this letter, and returning it to us accompanied by the original letter of credit.

Yours very truly,


Authorized Signature



Irving Trust

L/C No.

017133

Date

September 28, 1983

- ☐ Copy(ies) of this Letter of Credit.
- ☐ The original and copy(ies) of this Letter of Credit.
- ☐ Copy(ies) of an amendment to this Letter of Credit.
- ☐ The original and copy(ies) of an amendment to this Letter of Credit.

Karl J. Klepitsch
Waste Management Branch
USEPA, 111 W. Jackson Street
16th Floor
Chicago, Illinois 60604

282/00 (Rev. 2-83)

5HW

AUG 09 1983

MID067352989

Mr. J. Stewart Johnson
Manager, Hazardous Materials
Ciba-Geigy Corporation
444 Saw Mill River Road
Ardsley, New York 10502

Dear Mr. Johnson:

My staff has reviewed your letter of June 3, 1983, requesting EPA Region V concurrence to the revocation of your firm's closure letter of credit and standby trust. In that your firm's financial test, based on Ciba-Geigy Corporation's December 31, 1982 audited statements, meets the requirements of 40 CFR Part 265 Subpart H, EPA Region V consents to the revocation of Letter of Credit Number 017133 and the standby trust.

Feel free to contact Thomas B. Golz of my staff, at 886-4023, with questions on this matter.

Sincerely,

Basil G. Constantelos, Director
Waste Management Division

5HW:T.GOLZ:ad 7/27/83 Disk #2

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	WMB CHIEF	VMD
INITIALS	A.D.	JG	JG				XS
DATE	8-1-83	8/1/83	8/1/83			8/4/83	7/5/83

for

Emrda DJS 8/4

Trust Agreement

Trust Agreement, the "Agreement," entered into as of July 6, 1982 by and between CIBA-GEIGY, a New York corporation, the "Grantor," and Irving Trust Company, incorporated in the State of New York, the "Trustee."

Whereas, the United States Environmental Protection Agency, "EPA," an agency of the United States Government, has established certain regulations applicable to the Grantor, requiring that an owner or operator of a hazardous waste management facility shall provide assurance that funds will be available when needed for closure and/or post-closure care of the facility.

Whereas, the Grantor has elected to establish a trust to provide all or part of such financial assurance for the facilities identified herein.

Whereas, the Grantor, acting through its duly authorized officers, has selected the Trustee to be the trustee under this agreement, and the Trustee is willing to act as trustee.

Now, Therefore, the Grantor and the Trustee agree as follows:

Section 1. Definitions. As used in this Agreement:

(a) The term "Grantor" means the owner or operator who enters into this Agreement and any successors or assigns of the Grantor.

(b) The term "Trustee" means the Trustee who enters into this Agreement and any successor Trustee.

Section 2. Identification of Facilities and Cost Estimates. This Agreement pertains to the facilities and cost estimates identified on attached Schedule A.

Section 3. Establishment of Fund. The Grantor and the Trustee hereby establish a trust fund, the "Fund," for the benefit of EPA. The Grantor and the Trustee intend that no third party have access to the Fund except as herein provided. The Fund is established initially as consisting of the Letter of Credit dated July 6, 1982, which is acceptable to the Trustee, attached hereto. Such property and any other property subsequently transferred to the Trustee is referred to as the Fund, together with all earnings and profits thereon, less any payments or distributions made by the Trustee pursuant to this Agreement. The Fund shall be held by the Trustee, IN TRUST, as hereinafter provided. The Trustee shall not be responsible nor shall it undertake any responsibility for the amount or adequacy of, nor any duty to collect from the Grantor, any payments necessary to discharge any liabilities of the Grantor established by EPA.

Section 4. Payment for Closure and Post-Closure Care. The Trustee shall make payments from the Fund as the EPA Regional Administrator shall direct, in writing, to provide for the payment of the costs of closure and/or post-closure care of the facilities covered by this Agreement. The Trustee shall reimburse the Grantor or other persons as specified by the EPA Regional Administrator from the Fund for closure and post-closure expenditures in such amounts as the EPA Regional Administrator shall direct in writing. In addition, the Trustee shall refund to the

Grantor such amounts as the EPA Regional Administrator specifies in writing. Upon refund, such funds shall no longer constitute part of the Fund as defined herein.

Section 5. Payments Comprising the Fund. Payments made to the Trustee for the Fund shall consist of cash or securities acceptable to the Trustee.

Section 6. Trustee Management. The Trustee shall invest and reinvest the principal and income of the Fund and keep the Fund invested as a single fund, without distinction between principal and income, in accordance with general investment policies and guidelines which the Grantor may communicate in writing to the Trustee from time to time, subject, however, to the provisions of this Section. In investing, reinvesting, exchanging, selling, and managing the Fund, the Trustee shall discharge his duties with respect to the trust fund solely in the interest of the beneficiary and with the care, skill, prudence, and diligence under the circumstances then prevailing which persons of prudence, acting in a like capacity and familiar with such matters, would use in the conduct of an enterprise of a like character and with like aims; except that:

(i) Securities or other obligations of the Grantor, or any other owner or operator of the facilities, or any of their affiliates as defined in the Investment Company Act of 1940, as amended, 15 U.S.C. 80a-2.(a), shall not be acquired or held, unless they are securities or other obligations of the Federal or a State government;

(ii) The Trustee is authorized to invest the Fund in time or demand deposits of the Trustee, to the extent insured by an agency of the Federal or State government; and

(iii) The Trustee is authorized to hold cash awaiting investment or distribution uninvested for a reasonable time and without liability for the payment of interest thereon.

Section 7. Commingling and Investment. The Trustee is expressly authorized in its discretion:

(a) To transfer from time to time any or all of the assets of the Fund to any common, commingled, or collective trust fund created by the Trustee in which the Fund is eligible to participate, subject to all of the provisions thereof, to be commingled with the assets of other trusts participating therein; and

(b) To purchase shares in any investment company registered under the Investment Company Act of 1940, 15 U.S.C. 80a-1 et seq., including one which may be created, managed, underwritten, or to which investment advice is rendered or the shares of which are sold by the Trustee. The Trustee may vote such shares in its discretion.

Section 8. Express Powers of Trustee. Without in any way limiting the powers and discretions conferred upon the Trustee by the other provisions of this Agreement or by law, the Trustee is expressly authorized and empowered:

(a) To sell, exchange, convey, transfer, or otherwise dispose of any property held by it, by public or private sale. No person dealing with the Trustee shall be bound to see to the application of the purchase money or to inquire into the validity or expediency of any such sale or other disposition;

(b) To make, execute, acknowledge, and deliver any and all documents of transfer and conveyance and any and all other instruments that may be necessary or appropriate to carry out the powers herein granted;

(c) To register any securities held in the Fund in its own name or in the name of a Nominee and to hold any security in bearer form or in book entry, or to combine certificates representing such securities with certificates of the same issue held by the Trustee in other fiduciary capacities, or to deposit or arrange for the deposit of such securities in a qualified central depository even though, when so deposited, such securities may be merged and held in bulk in the name of the nominee of such depository with other securities deposited therein by another person, or to deposit or arrange for the deposit of any securities issued by the United States Government, or any agency or instrumentality thereof, with a Federal Reserve bank, but the books and records of the Trustee shall at all times show that all such securities are part of the Fund;

(d) To deposit any cash in the Fund in interest-bearing accounts maintained or savings certificates issued by the Trustee, in its separate corporate capacity, or in any other banking institution affiliated with the Trustee, to the extent insured by an agency of the Federal or State government; and

(e) To compromise or otherwise adjust all claims in favor of or against the Fund.

Section 9. Taxes and Expenses. All taxes of any kind that may be assessed or levied against or in respect of the Fund and all brokerage commissions incurred by the Fund shall be paid from the Fund. All other expenses incurred by the Trustee in connection with the administration of this Trust, including fees for legal services rendered to the Trustee, the compensation of the Trustee to the extent not paid directly by the Grantor, and all other proper charges and disbursements of the Trustee shall be paid from the Fund.

Section 10. Annual Valuation. The Trustee shall annually, at least 30 days prior to the anniversary date of establishment of the Fund, furnish to the Grantor and to the appropriate EPA Regional Administrator a statement confirming the value of the Trust. Any securities in the Fund shall be valued at market value as of no more than 60 days prior to the anniversary date of establishment of the Fund. The failure of the Grantor to object in writing to the Trustee within 90 days after the statement has been furnished to the Grantor and the EPA Regional Administrator shall constitute a conclusively binding assent by the Grantor, barring the Grantor from asserting any claim or liability against the Trustee with respect to matters disclosed in the statement.

Section 11. Advice of Counsel. The Trustee may from time to time consult with counsel, who may be counsel to the Grantor, with respect to any question arising as to the construction of this Agreement or any action to be taken hereunder. The Trustee shall be fully protected, to the extent permitted by law, in acting upon the advice of counsel.

Section 12. Trustee Compensation. The Trustee shall be entitled to reasonable compensation for its services as agreed upon in writing from time to time with the Grantor.

Section 13. Successor Trustee. The Trustee may resign or the Grantor may replace the Trustee, but such resignation or replacement shall not be effective until the

Grantor has appointed a successor trustee and this successor accepts the appointment. The successor trustee shall have the same powers and duties as those conferred upon the Trustee hereunder. Upon the successor trustee's acceptance of the appointment, the Trustee shall assign, transfer, and pay over to the successor trustee the funds and properties then constituting the Fund. If for any reason the Grantor cannot or does not act in the event of the resignation of the Trustee, the Trustee may apply to a court of competent jurisdiction for the appointment of a successor trustee or for instructions. The successor trustee shall specify the date on which it assumes administration of the trust in a writing sent to the Grantor, the EPA Regional Administrator, and the present Trustee by certified mail 10 days before such change becomes effective. Any expenses incurred by the Trustee as a result of any of the acts contemplated by this Section shall be paid as provided in Section 9.

Section 14. Instructions to the Trustee. All orders, requests, and instructions by the Grantor to the Trustee shall be in writing, signed by such persons as are designated in the attached Exhibit A or such other designees as the Grantor may designate by amendment to Exhibit A. The Trustee shall be fully protected in acting without inquiry in accordance with the Grantor's orders, requests, and instructions. All orders, requests, and instructions by the EPA Regional Administrator to the Trustee shall be in writing, signed by the EPA Regional Administrators of the Regions in which the facilities are located, or their designees, and the Trustee shall act and shall be fully protected in acting in accordance with such orders, requests, and instructions. The Trustee shall have the right to assume, in the absence of written notice to the contrary, that no event constituting a change or a termination of the authority of any person to act on behalf of the Grantor or EPA hereunder has occurred. The Trustee shall have no duty to act in the absence of such orders, requests, and instructions from the Grantor and/or EPA, except as provided for herein.

Section 15. Notice of Nonpayment. The Trustee shall notify the Grantor and the appropriate EPA Regional Administrator, by certified mail within 10 days following the expiration of the 30-day period after the anniversary of the establishment of the Trust, if no payment is received from the Grantor during that period. After the pay-in period is completed, the Trustee shall not be required to send a notice of nonpayment.

Section 16. Amendment of Agreement. This Agreement may be amended by an instrument in writing executed by the Grantor, the Trustee, and the appropriate EPA Regional Administrator, or by the Trustee and the appropriate EPA Regional Administrator if the Grantor ceases to exist.

Section 17. Irrevocability and Termination. Subject to the right of the parties to amend this Agreement as provided in Section 16, this Trust shall be irrevocable and shall continue until terminated at the written agreement of the Grantor, the Trustee, and the EPA Regional Administrator, or by the Trustee and the EPA Regional Administrator, if the Grantor ceases to exist. Upon termination of the Trust, all remaining trust property, less final trust administration expenses, shall be delivered to the Grantor.

Section 18. Immunity and Indemnification. The Trustee shall not incur personal liability of any nature in connection with any act or omission, made in good faith, in the administration of this Trust, or in carrying out any directions by the Grantor or the EPA Regional Administrator issued in accordance with this Agreement. The Trustee

shall be indemnified and saved harmless by the Grantor or from the Trust Fund, or both, from and against any personal liability to which the Trustee may be subjected by reason of any act or conduct in its official capacity, including all expenses reasonably incurred in its defense in the event the Grantor fails to provide such defense.

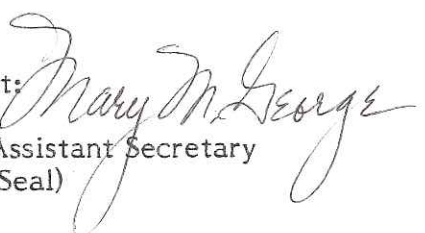
Section 19. Choice of Law. This Agreement shall be administered, construed, and enforced according to the laws of the the state of New York.

Section 20. Interpretation. As used in this Agreement, words in the singular include the plural and words in the plural include the singular. The descriptive headings for each Section of this Agreement shall not affect the interpretation or the legal efficacy of this Agreement.

In Witness Whereof the parties have caused this Agreement to be executed by their respective officers duly authorized and their corporate seals to be hereunto affixed and attested as of the date first above written. The parties below certify that the wording of this Agreement is identical to the wording specified in 40 CFR 264.151(a)(1) as such regulations were constituted on the date first above written.

CIBA-GEIGY Corporation


By: 

Attest: 

Assistant Secretary
(Seal)

Irving Trust Company

By: 

Attest: 

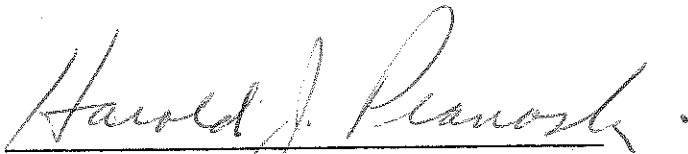
(Seal)

CERTIFICATION OF ACKNOWLEDGEMENT

State of New York

County of New York

On this July 6, 1982, before me personally came Robert Eric Furst, to me known, who, being by me duly sworn, did depose and say that he resides at 361 Emerson La., Berkeley Heights, N.J. that he is a Vice President of Irving Trust Company, the corporation described in and which executed the above instrument; that he knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed under authority of the Board of Directors of said corporation, and that he signed his name thereto under like authority.



Notary

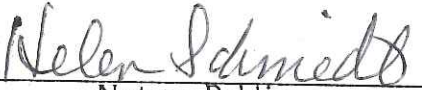
HAROLD J. PEANOSKI
Notary Public, State of New York
No. 31-4504461
Qualified in New York County
Commission Expires March 30, 1983

CERTIFICATION OF ACKNOWLEDGMENT

State of New York

County of Westchester

On this July 6, 1982 before me personally came Mary George to me known, who, being by me duly sworn, did depose and say that she resides at Danbury, Connecticut, that she is Assistant Secretary of CIBA-GEIGY Corporation, the corporation described in and which executed the above instrument; that she knows the seal of said corporation; that the seal affixed to such instrument is such corporate seal; that it was so affixed under authority of the Board of Directors of said corporation, and that she signed her name thereto under like authority.



Notary Public

HELEN SCHMIDT

Notary Public, State of New York

No. 4717666

Qualified in Westchester County

Commission Expires March 30, 1984

SCHEDULE 'A'

<u>REGION</u>	<u>ADDRESS</u>	<u>EPA ID #</u>	<u>\$ CLOSURE</u>	
I	CIBA-GEIGY Corporation 180 Mill Street Cranston, RI 02905	RID001194342	\$ 373,000	
II	CIBA-GEIGY Corporation 444 Saw Mill River Road Ardsley, NY 10502	NYD001221845	7,000	
	CIBA-GEIGY Corporation Lower Warren Street Glens Falls, NY 12801	NYD002069748	625,000 24,000	post-closure
	CIBA-GEIGY Corporation P.O. Box 100 Suffern, NY 10901	NYD013238480	22,000	
	CIBA-GEIGY Corporation 556 Morris Avenue Summit, NJ 07901	NJD001316173	20,000	
	CIBA-GEIGY Corporation P.O. Box 71 Toms River, NJ 08753	NJD001502517	139,000	
III	Drakenfeld Colors West Wylie Avenue P.O. Box 519 Washington, PA 15301	PAD041731670	21,000	
IV	CIBA-GEIGY Corporation 410 Swing Road Greensboro, NC 27419	NCD061801361	67,000	
	CIBA-GEIGY Corporation P.O. Box 113 McIntosh, AL 36553	ALD001221902	12,569,000 77,000	post-closure
V	CIBA-GEIGY Corporation 4917 Dawn Avenue East Lansing, MI 48823	MID067352989	26,000	
VI	CIBA-GEIGY Corporation P.O. Box 11 St. Gabriel, LA 70776	LAD053783445	856,000	
IX	CIBA-GEIGY Corporation 10910 Talbert Avenue Fountain Valley, CA 92708	CAD000089722	12,000	
Total Closure			\$14,737,000	
Total Post-Closure			\$ 101,000	
Total Letter of Credit			<u>\$14,838,000</u>	

Schedule A

Region I

Conrad Desrosiers, Waste Management
Branch, USEPA, John F. Kennedy Building,
Boston, MA 02203 (617) 223-5775

Region II

Garrett Smith, Hazardous Waste Program
Support Section, USEPA, 26 Federal Plaza.
New York, NY 10278, (212) 264-0504

Region III

John Armstead, Solid Waste Program,
USEPA, 6th and Walnut Streets,
Philadelphia, PA 19106, (215) 597-7259

Region IV

Bill Holland, Hazardous Waste Section,
USEPA, 345 Courtland Street, N.E.,
Atlanta, GA 30365, (404) 881-3016

Region V

Karl J. Klepitsch, Waste Management Branch,
USEPA, 111 W. Jackson Street, 16th Floor,
Chicago, IL 60604, (312) 886-7435

Region VI

Pat Hull, State Programs Section, USEPA,
1201 Elm Street, First International
Building, Dallas, TX 75270, (214) 767-2645

Region IX

Alexis Strauss, State Programs,
USEPA, 215 Fremont Street,
San Francisco, CA 94105, (415) 974-8245



**Irving
Trust**

Irving Trust Company
One Wall Street
New York, NY 10015

Irrevocable Standby Letter of Credit

Regional Administrators - See Schedule A
Regions - See Schedule A
U.S. Environmental Protection Agency

*original
returned
T B &
per 08-05-83
BGC letter*

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. 017133 in your favor, at the request and for the account of CIBA-GEIGY Corporation, 444 Saw Mill River Road, Ardsley, New York 10502, up to the aggregate amount of Fourteen million, Eight hundred and thirty-eight thousand U.S. dollars, \$14,838,000.00, available upon presentation by the administrators of the regions in the amounts set forth in the attached Schedule A.

(1) your sight draft, bearing reference to this Letter of credit No. 017133, and

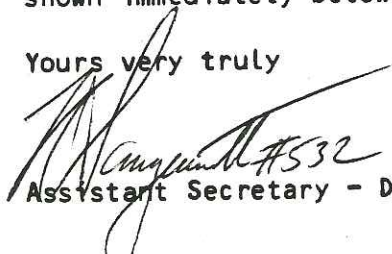
(2) your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under authority of the Resource Conservation and Recovery Act of 1976 as amended."

This letter of credit is effective as of July 6, 1982 and shall expire on July 6, 1983, but such expiration date shall be automatically extended for a period of at least 1 year on July 6, 1983 and on each successive expiration date, unless, at least 120 days before the current expiration date, we notify both you and CIBA-GEIGY by certified mail that we have decided not to extend this letter of credit beyond the current expiration date. In the event you are so notified, any unused portion of the credit shall be available upon presentation of your sight draft for 120 days after the date of receipt by both you and CIBA-GEIGY, as shown on the signed return receipts.

Whenever this letter of credit is drawn on under and in compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we shall deposit the amount of the draft directly into the standby trust fund of CIBA-GEIGY in accordance with your instructions.

We certify that the wording of this letter of credit is identical to the wording specified in 40 CFR 264.151(d) as such regulations were constituted on the date shown immediately below.

Yours very truly


Assistant Secretary - Date: July 6, 1982

This credit is subject to the most recent edition of the "Uniform Customs and Practice for Documentary Credits", published by the International Chamber of Commerce."

SCHEDULE 'A'

REGION	ADDRESS	EPA ID #	\$ CLOSURE
I	CIBA-GEIGY Corporation 180 Hill Street Cranston, RI 02905	RID001194342	\$ 373,000
II	CIBA-GEIGY Corporation 444 Saw Mill River Road Ardsley, NY 10502	NYD001221845	7,000
	CIBA-GEIGY Corporation Lower Warren Street Glens Falls, NY 12801	NYD002069748	625,000 24,000 post-closure
	CIBA-GEIGY Corporation P.O. Box 100 Suffern, NY 10901	NYD013238480	22,000
	CIBA-GEIGY Corporation 556 Morris Avenue Summit, NJ 07901	NJD001316173	20,000
	CIBA-GEIGY Corporation P.O. Box 71 Toms River, NJ 08753	NJD001502517	139,000
III	Drakenfeld Colors West Wylie Avenue P.O. Box 519 Washington, PA 15301	PAD041731670	21,000
IV	CIBA-GEIGY Corporation 410 Swing Road Greensboro, NC 27419	NCD061801361	67,000
	CIBA-GEIGY Corporation P.O. Box 113 McIntosh, AL 36553	ALD001221902	12,569,000 77,000 post-closure
V	CIBA-GEIGY Corporation 4917 Dawn Avenue East Lansing, MI 48823	MID067352989	26,000
VI	CIBA-GEIGY Corporation P.O. Box 11 St. Gabriel, LA 70776	LAD053783445	856,000
IX	CIBA-GEIGY Corporation 10910 Talbert Avenue Fountain Valley, CA 92708	CAD000089722	12,000
Total Closure			\$14,737,000
Total Post-Closure			\$ 101,000
Total Letter of Credit			<u>\$14,838,000</u>

Schedule A

Region I

Conrad Desrosiers, Waste Management
Branch, USEPA, John F. Kennedy Building,
Boston, MA 02203 (617) 223-5775

Region II

Garrett Smith, Hazardous Waste Program
Support Section, USEPA, 26 Federal Plaza.
New York, NY 10278, (212) 264-0504

Region III

John Armstead, Solid Waste Program,
USEPA, 6th and Walnut Streets,
Philadelphia, PA 19106, (215) 597-7259

Region IV

Bill Holland, Hazardous Waste Section,
USEPA, 345 Courtland Street, N.E.,
Atlanta, GA 30365, (404) 881-3016

Region V

Karl J. Klepitsch, Waste Management Branch,
USEPA, 111 W. Jackson Street, 16th Floor,
Chicago, IL 60604, (312) 886-7435

Region VI

Pat Hull, State Programs Section, USEPA,
1201 Elm Street, First International
Building, Dallas, TX 75270, (214) 767-2645

Region IX

Alexis Strauss, State Programs,
USEPA, 215 Fremont Street,
San Francisco, CA 94105, (415) 974-8245

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
ERRY KAMMER
O. STEWART MYERS
DAVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

DAVID F. HALES, Director

Region III Headquarters
P.O. Box 30028, Lansing, MI 48909

April 20, 1990

Mr. Mike Munsell
Ciba-Geigy Corporation
Ren Plastics Division
4917 Dawn Avenue
East Lansing, MI 48823

MID 067 352 989

Dear Mr. Munsell:

On April 19, 1990, staff of the Michigan Department of Natural Resources conducted an inspection of your facility located at in , Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and Michigan's Hazardous Waste Management Act, P.A. 64 of 1979, as amended. Attached is a copy of the inspection report for your information.

As a result of that inspection, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA and the Hazardous Waste Management Act. Specifically, staff found that:

1. The contingency plan has not been amended to reflect changes that have developed at the site. Such changes must be noted in the plan as required by 40 CFR 265.54, Subpart D.
2. The hazardous waste storage area had several cracks in the floor. 40 CFR 265.175(b)(1) states in part that the hazardous waste storage floor area must have an impervious base free of cracks.

We request that you respond, in writing, to this letter by May 11, 1990, providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

Leroy Vahovick

Leroy Vahovick
Environmental Quality Analyst
WASTE MANAGEMENT DIVISION
Lansing District Office

517-322-5104

Lansing

Region III Headquarters
P.O. Box 30028, Lansing, MI 48909

June 21, 1988

Mr. Michael L. Munsell
S H & E Specialist
Ciba-Geigy
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID 067352989

Dear Mr. Munsell:

On June 13, 1988 staff of the Michigan Department of Natural Resources conducted an inspection of your facility located at 4917 Dawn Avenue in East Lansing, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. Enclosed is a copy of the inspection report for your information.

This inspection revealed that your facility was in compliance with the RCRA requirements evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely

Leroy Vahovick
Leroy Vahovick
Environmental Quality Analyst
Waste Management Division
517-322-5104

LV:mj

Enclosure

RCRA/ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER M 1 D 0 6 7 3 5 2 9 8 8
(or Michigan)

FACILITY NAME
(Mailing Address)

Ciba-Geigy

4917 Dawn Ave

E. Lansing
CITY

MICHIGAN

48823

ZIP CODE

DATE 6/13/88

TIME OF INSPECTION (FROM) 1:30p (TO) 3:30p

PERSON(S) INTERVIEWED

TITLE

TELEPHONE

Michael L. Munzell

SHE Specialist

517-351-5800

INSPECTOR(S)

AGENCY/TITLE

TELEPHONE

Leroy Vahovich MDNR Env Quality Analyst

517 322 1300

Primary Business of this Facility:

Reason for Inspection:

☒ Routine

☐ Follow-up

☐ Complaint

INSPECTION FORMS:

FORM

Based upon the inspection, this facility:

☐ is a non-generator/conditionally exempt small quantity generator

☐ small quantity generator

☒ generator

☐ transporter

☒ ~~treatment/storage/disposal facility~~

A
A
B
C
D

Date of Last Inspection

5/18/87

INSPECTION FORM D
Part 6 of Rules
P.A. 64 of 1979
TREATMENT, STORAGE, DISPOSAL FACILITY

This Facility:

- ☒ Generates Hazardous Waste (Also use Generator Appendix)
- ☐ Treats Hazardous Waste
- ☒ Stores Hazardous Waste
- ☐ Disposes of Hazardous Waste
- ☐ Transports Hazardous Waste (Also use Form C)

This Facility:

- ☐ Accepts wastes from off-site sources
- ☒ Handles only its own wastes

If applicable, hazardous waste is stored in the following:

- ☒ Drums (Containers)
- ☐ Above-ground tanks
- ☐ Underground tanks
- ☐ Waste piles
- ☐ Lagoons
- ☐ Other
- ☐ Not applicable

If applicable, hazardous wastes are treated/disposed in the following:
(Attach appropriate checklist)

- ☐ Surface Impoundments
- ☐ Waste piles
- ☐ Land Treatment
- ☐ Landfills
- ☐ Incineration/Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☐ Above-ground tanks

INSPECTION D

 Underground tanks34 ~~28~~ Drums Other Not applicableWASTE STREAMS

Hazardous Waste

Code/NameSourceType
of StorageHow Much7005 Solvent cleaning solvents cleaning drums117002 Methylene chloride cleaning6009 Mercury batch heats & outdated material3001 solvents soaked rags14

INSPECTION FORM D
Part 6 Rules
P.A. 64 of 1979

HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITY
Applies to Those Facilities That Do Not Have an Act 64 Permit

General Facility Standards
Rule 601, 40 CFR 265, Subpart B

<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Violation</u> <u>Class</u>
------------	-----------	------------	----------------------------------

1. If required, have the following been notified:

a.) Notified Director of receipt of hazardous waste from a foreign source? 265.12(a)

—	—	✓	II
---	---	---	----

b.) Notified Director of change of owner or operator.
40 CFR Part 270. 265.12(b)

—	—	✓	II
---	---	---	----

Comments: _____

2. General Waste Analysis: 265.13

a.) Has the owner or operator obtained a detailed chemical and physical analysis of the waste? 265.13(a)

—	—	✓	I
---	---	---	---

b.) Does the owner or operator have a detailed waste analysis plan on file at the facility? 265.13(b)

✓	—	—	I
---	---	---	---

c.) Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site? 265.13(c)

✓	—	✓	I
---	---	---	---

Comments: _____

INSPECTION FORM D

	Yes	No	N/A	Violation Class
--	-----	----	-----	-----------------

3. Security - If applicable, do security measures include:

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|---|
| a.) 24-hour surveillance? 265.14(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| or | | | | I |
| b.) i. Artificial or natural barrier around facility? 265.14(b)(2)(i) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| and | | | | |
| ii. Controlled entry? 265.14(b)(2)(ii) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| c.) Danger sign(s) at entrance? 265.14(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |

Comments: _____

4. Owner or operator inspections: 265.15*

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|----|
| a.) Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment? 265.15(a) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| b.) Does the owner or operator have a written inspection schedule at the facility? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| c.) If so, does the schedule address the inspection of the following items: | | | | |
| i. Monitoring equipment? 265.15(b)(1) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | II |
| ii. Safety and emergency equipment? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iii. Security devices? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iv. Operating and structural equipment (i.e. dikes, pumps, etc.)? 265.15(b)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

* These violations are Class II, unless observations of hazardous conditions or violations are noted in the log and not corrected which result in the release or actual harm to the environment or human health; in such instances violations are Class I.

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

- | | | | | | |
|------|---|-------------------------------------|--------------------------|--------------------------|----|
| v. | Type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| vi. | inspection frequency (based upon the possible deterioration rate of the equipment)? 265.15(b)(4) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| d.) | Are areas subject to spills inspected daily when in use? 265.15(b)(4) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| e.) | Does the owner or operator maintain an inspection log or summary of owner or operator inspections? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| f.) | Does the inspection log contain the following information: 265.15(d) | | | | |
| i. | The date and time of the inspection? 265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| ii. | The name of the inspector? 265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iii. | A notation of the observations made? 265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| iv. | The date and nature of any repairs or remedial actions? 265.15(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

Comments: _____

5. Do personnel training records include: 265.16

- | | | | | | |
|-----|---------------------------------------|-------------------------------------|--------------------------|--------------------------|---|
| a.) | Job titles? 265.16(d)(1) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| b.) | Job descriptions? 265(d)(2) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| c.) | Description of training? 265.16(d)(3) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |

INSPECTION FORM D

	Yes	No	N/A	Violation Class
--	-----	----	-----	-----------------

d.) Records of training?
265.16(d)(4)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

e.) Do new personnel receive re-
quired training within six
months? 265.16(d)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

f.) Do personnel training records
indicate that personnel have
taken part in an annual review
of training? 264.16(c)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

Comments:

6. If required, are the following special
requirements for ignitable, reactive, or
incompatible wastes addresses?
265.17

a.) Special handling? 265.17(a)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I

b.) No smoking signs? 265.17(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

c.) Separation and protection from
ignition sources? 265.17(a)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	--------------------------	---

Comments:

PREPAREDNESS AND PREVENTION
Rule 606, 40 CFR 265, Subpart C

1. Is there any evidence of fire, explosion,
or release of hazardous waste or hazard-
ous waste constituents 40 CFR Rule 265.31

<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
-------------------------------------	--------------------------	---

Comments:

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. If required, does this facility have the following equipment: 40 CFR 265.32

- | | | | | |
|--|-------------------------------------|--------------------------|--------------------------|---|
| a.) Internal communications or alarm systems. 40 CFR 265.32(a) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(b) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| d.) Indicate the volume of water and/or foam available for fire control. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |

Max Radiant Turf

Comments: _____

3. Testing and Maintenance of Emergency Equipment: 265.33

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|---|
| a.) Has the owner or operator established testing and maintenance procedures for emergency equipment? 265.33 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| b.) Is emergency equipment maintained in operable condition? 265.33 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| c.) <u>If required</u> , has owner or operator provided immediate access to internal alarms? 40CFR 265.34(a) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | |
| d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment. 40 CFR 265.35. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |

INSPECTION FORM D

Yes No N/A Violation Class

Comments:

4. Has the owner or operator attempted to make arrangements with local authorities in case of emergencies. 40 CFR 265.37

II

Comments:

CONTINGENCY PLAN AND EMERGENCY PROCEDURES

Rule 607, 40 CFR 265 Subpart D.

1. Does the contingency plan contain the following information:

- a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (As applicable). 265.52(a)

I

- b.) Arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 265.37

II

- c.) Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d)

II

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

- | | | | | |
|--|-------------------------------------|--------------------------|-------------------------------------|----|
| d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40 CFR 265.52(e) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.) 40 CFR 265.52(f) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| f.) Is the facility emergency coordinator identified. 40 CFR 265.55 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| g.) Is coordinator familiar with all aspects of site operation and emergency procedures. 40 CFR 265.55 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan. 40 CFR 265.55 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |
| i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| j.) Has contingency plan been amended to reflect changes in regulations, plan failure, changes in the facility, list of emergency coordinators, changes in emergency equipment. 40 CFR 265.54 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | II |

Comments:

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

2. Are copies of the contingency plan available at site and local emergency organizations. 40 CFR 265.53(a) 264.53(b)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
-------------------------------------	--------------------------	--------------------------	----

Comments: _____

USE OF MANIFEST SYSTEM Rule 601(2)(b)

1. Does this facility receive hazardous waste accompanied by a manifest. If yes, complete the following:

a.) Are copies signed and dated.

Rule 608(1)(a)

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	-------------------------------------	--------------------------	---

b.) Are significant discrepancies noted on the manifest.

Rule 608(1)(b)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

c.) Are transporters given 1 copy of the signed manifest.

Rule 608(1)(c)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

d.) Are copies sent to the generator within 30 days. Rule 608(1)(d)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

e.) Are copies of the manifest retained for 3 years.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
--------------------------	--------------------------	--------------------------	---

f.) Are copies of the manifest returned to DNR within 10 days after end of month. Rule 608(1)(f)

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
--------------------------	--------------------------	--------------------------	----

Comments: _____

INSPECTION FORM D

Yes No N/A Violation
Class

2. Does this facility ship hazardous waste off-site. If yes, complete Generator Appendix. Rule 608(3)

N/A

Comments:

3. For unreconciled significant discrepancies in manifests has the Director been notified. Rule 608(4)

I

Comments:

RECORDKEEPING

Rule 601(3) 40 CFR 265. Subpart E

1. Does the owner or operator of this facility maintain an operating record? Rule 609(1)

II

Comments:

2. Does this operating record contain: 265.73

- a.) The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265.73(b)(1) Appendix E

II

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) 265.73(b)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
c.) If this facility disposes of hazardous waste on-site, is there a map or diagram of disposal area. 265.73(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
d.) Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? 265.73(b)(3)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
e.) Reports detailing all incidents that required implementation of the Contingency Plan? 265.73(b)(4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
f.) Records and results of inspections as required in 40 CFR 264.15(d) 265.73(b)(5)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) <u>If required</u> , monitoring, testing, or analytical when required by construction permit or operating license. Rule 265.73(b)(6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	II
h.) Closure and post closure cost estimates. 265.73(b)(7)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II

Comments: _____

3. Are all required records available and maintained for at least 3 years. 265.74(3)

II

INSPECTION FORM D

Yes No N/A Violation Class

Comments:

REPORTING

1. Has the owner or operator submitted a biennial report to the required administration by March 1 of even numbered years? 265.75

II

Comments:

2. If applicable, for TSD's that receive hazardous waste from off-site sources. Rule 265.76

I

- a.) Has the facility accepted any hazardous waste from an off-site generator subject to Rule 205 without a manifest or shipping paper?

I

- b.) If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

I

USE AND MANAGEMENT OF CONTAINERS Drums/Roll-off Boxes/Gondolas

1. Is hazardous waste accumulated in containers? If no, skip to tank section.

N/A

2. a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c)? If no, how many

I

INSPECTION FORM D

	Yes	No	N/A	Violation Class
b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules) If yes, how many drums _____ Accumulation dates _____	—	✓	—	I
c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c). If no, how many _____	✓	—	—	I
d.) Are containers in good condition Rule 306(1)(a), 40 CFR 265.171. If no, specifically what is their conditions. _____	✓	—	—	I
e.) Are containers compatible with waste in them. RULE 306(1)(a) 40 CFR 265.172. If no, explain _____	✓	—	—	I
f.) Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a) If no, how many _____	✓	—	—	I
g.) Are containers managed to prevent leaks? Rule 306(1)(a), 40 CFR 265.173(b) If no, explain _____	✓	—	—	I
h.) Are containers inspected weekly for leaks and defects? Rule 306(1)(a) 40 CFR 265.174.	✓	—	—	I
i.) Are ignitable and reactive wastes stored at least 15 meters (50 Feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	✓	—	—	I
j.) Are incompatible wastes stored in separate containers (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____	—	—	✓	I

INSPECTION FORM D

Yes	No	N/A	Violation Class
-----	----	-----	--------------------

- k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177.

—	—	✓	I
---	---	---	---

Comments: _____

3. If storing free liquid, does hazardous waste storage area include: rule 306(1)(a) 40 CFR 264.175.

- a.) Impervious base free of cracks. 40 CFR 264.175(b)(1)

✓	—	—	I
---	---	---	---

- b.) Containment capable of holding 10% of volume of containers or 10% of largest container whichever is greater.

✓	—	—	I
---	---	---	---

Comments: _____

4. Is hazardous waste being accumulated at the point of generation, Rule 306(2)

✓	—	—	N/A
---	---	---	-----

If yes:

- a.) Is container less than 55 gallons or one quart of acutely hazardous waste? Rule 306(2)

✓	—	—	I
---	---	---	---

- b.) Is container under control or operator and near point of generation and under control of operator? Rule 306(2)

✓	—	—	I
---	---	---	---

- c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171

✓	—	—	I
---	---	---	---

INSPECTION FORM D
Violation
Class

d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172

Yes

No

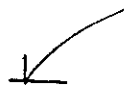
N/A

Class



I

e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173



I

f.) Are containers marked with the words "Hazardous Waste" and waste number (or other words that identify the contents) Rule 306(2)



I

Comments:

TANKS

1. Is hazardous waste accumulated in tanks? If no, skip to c.



N/A

a.) Is each tank labeled or marked with the words "Hazardous Waste", Rule 306(1)(a), 40 CFR 252.34(a)

I

b.) Are tanks used to store only those wastes which will not cause corrosion, leaking or premature failure of the tank? Rule 306(1)(a), 40 CFR 262.192(b).

I

c.) Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structure. Rule 306(1)(a), 40 CFR 265.192(c)?

I

d.) Do continuous feed systems have a waste feed cutoff? Rule 306(1)(a), 40 CFR 265.192(d).

I

e.) Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?

II

INSPECTION FORM D

Yes No N/A Violation Class

Comments:

3. Do owners and operators of underground tanks do all the following:

a.) Provide secondary adequate containment and leachate collection system. Rule 615(4)(a)

b.) Conduct an inventory of the contents of the tanks at least twice a month. rule 615(4)(b)

c.) Conduct leachate sampling at least once a year. Rule 615(4)(c)

d.) Maintain an accurate inventory of the tank. Rule 615(4)(d)

I

I

I

I

Comments:

4. Is hazardous waste accumulated in other than tanks or containers? If yes, explain

N/A

Comments:

INSPECTION FORM D

CLOSURE AND POST CLOSURE (Part 265 Subpart G) Part 7 of Act 64 Rules

Violation Yes No N/A Class

1. Closure 265.112

a.) Is the facility closure plan available for inspection?

b.) Does the plan identify

1. maximum extent unclosed during facility life?

11. maximum hazardous waste inventory?

111. estimated year of closure

1v. schedule of closure activities

Comments:

*2. Post-Closure 265.118 - Act 64 Rules

a.) Is the post-closure plan available for inspection?

b.) Does this plan contain:

1. description of groundwater monitoring activities and frequencies?

11. description of maintenance activities and frequencies for

AA. integrity of cap. final cover, or containment structures, where applicable.

BB. facility monitoring equipment.

I

I

I

I

I

I

I

I

I

Violation
Yes No N/A Class

GENERATOR APPENDIX

Section A: Scope

Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Manifest Requirements

- | | | | | |
|----|---|---|--------------------------------|----|
| 1. | a.) Does the generator have copies of the manifest available for review and on-site. 262.40 | ✓ | | II |
| | b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. | | | |
| | | | <i>shipments</i>
9 for 1997 | |

Comments: _____

- | | | | | |
|----|--|---|--|----|
| 2. | Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements: | | | |
| | a.) Manifest document number (Rule 304(2)(a)? | ✓ | | II |
| | b.) The generator's name, mailing address, telephone number, and EPA Identification number. Rule 204(2)(b) | ✓ | | II |
| | c.) The name and EPA ID number of transporter. Rule 304(2)(c) | ✓ | | II |
| | d.) Name, address, and EPA ID number of designated permitted facility and alternate facility. Rule 304(2)(d) | ✓ | | II |
| | e.) The description of waste(s) (DOT shipping name, DOT hazard class, DOT identification number. Rule 304(2)(e) | ✓ | | II |

GENERATOR APPENDIX

	Yes	No	N/A	Violation Class
--	-----	----	-----	--------------------

f.) The total quantity of waste(s) and the type and number of containers loaded. Rule 304(1)(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) Hazardous waste number describing the wastes. Rule 304(1)(g)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Certification as required in Rule 304(1)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
i.) Signatures as required in Rule 304(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
j.) Waste minimization program/certification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

3. Reportable exceptions. Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. _____	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I
b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Comments: _____

April 22, 1986

Mr. Mike Munsell
Ciba-Geigy - Ren Plastics
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID 067352989

Dear Mr. Munsell:

On April 18, 1986, staff of the Department of Natural Resources conducted an investigation of your facility located at 4917 Dawn Avenue in East Lansing, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

This inspection revealed that your facility was in compliance with the RCRA requirements evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Enclosed is a copy of the inspection report for your information.

Also, the matter of the design of your secondary containment, as it now exists appears to be adequate, however, the removal and replacement of the plug in the drain cover, causes me great concern. I strongly urge you to re-evaluate your present secondary containment and consider a safer or more secure structure for the storage of your hazardous waste materials. I have enclosed a portion of the Federal Regulations that apply to containment, for your information.

Sincerely,

Leroy Vahovick
Leroy Vahovick
Env. Quality Analyst
DNR - Lansing District
HWD - Region III
P.O. Box 30028
Lansing, MI 48909
517-322-1300

LV/ms

Enclosure

cc: U.S. EPA - Region V

RCRA Inspection Report

Identification Number: M I D 0 6 7 3 5 2 9 8 9

Installation Name: Ciba Geigy - Ren plastics

Location Address: 4917 Dawn Ave

City: East Lansing State: Mich 48823

Date of inspection: 4/18/86 Time of inspection (from) 10:30A (to) 11:45A

Person(s) interviewed	Title	Telephone
<u>Mike Munsell</u>	<u>Ind Health + Safety Coordinator</u>	<u>517 351 5900</u>
<u>AN Cianciarolo</u>	<u>Mgr. Tech + Mfg support</u>	<u>" "</u>
<u>John Henige</u>		

Inspector(s)	Agency/Title	Telephone
<u>Leroy Valovich</u>	<u>MDNR Env Quality Analyst</u>	<u>517-322-1300</u>

Installation Activity (mark only one box)

Inspection Form(s)

- | | |
|---|------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or | |
| Generation and/or Transportation | |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | A |
| <input type="checkbox"/> Generation only | B, C |
| <input type="checkbox"/> Transportation only | B |
| | C |

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?				
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?				
ii. safety and emergency equipment?				
iii. security devices?				
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?				
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?				
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?				
d. Are areas subject to spills inspected daily when in use?				
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?				
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?				
ii. the name of the inspector?				
iii. a notation of the observations made?				
iv. the date and nature of any repairs or remedial actions?				
5. Do personnel training records include: 265.16				
a. Job titles?	✓			
b. Job descriptions?	✓			

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

_____ ✓ _____ _____

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

✓ _____ _____ _____

b. Telephone or 2-way radios
at the scene of operations?

✓ _____ _____ _____

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ _____ _____ _____

Indicate the volume of water and/or foam available for fire control:

City water

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ _____ _____ _____

b. Is emergency equipment
maintained in operable
condition?

✓ _____ _____ _____

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

✓ _____ _____ _____

5. Is there adequate aisle space
for unobstructed movement?

✓ _____ _____ _____

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

✓ _____ _____ _____

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<input checked="" type="checkbox"/>			OK
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<input checked="" type="checkbox"/>			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<input checked="" type="checkbox"/>			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<input checked="" type="checkbox"/>			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<input checked="" type="checkbox"/>			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<input checked="" type="checkbox"/>			

YES NO NI Remarks

Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

<i>None have occurred</i>			
---------------------------	--	--	--

Section G - CLOSURE AND POST CLOSURE (Part 26 Subpart G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iv. estimated year of closure?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>open ended</i>
v. schedule of closure activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
BB. facility monitoring equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
iii. name, address, and phone number of person or office to contact during post-closure care period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is the written post-closure cost estimate available? 265.144	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Not Applicable</i>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>" "</i>

Appendix GN

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period.				<u>15 of 36 manifests examined</u>
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. _____				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input checked="" type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

APR 16 1986

5CS-16

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. Stewart Johnson
Manager, Hazardous Materials
Safety, Health & Ecology
Ciba-Geigy Corporation
444 Saw Mill River Road
Ardsley, New York 10502

Re: Notice of Opportunity to Submit Comments
Substantiating Claim of Business Confidentiality

Dear Mr. Johnson:

Ciba-Geigy has submitted revisions of the financial assurance documents for closure and post-closure for the years 1985 and 1986. The revisions pertain to the Ren Plastics subsidiary in East Lansing, Michigan. At the time you submitted these documents to U.S. EPA pursuant to the Resource Conservation and Recovery Act (RCRA), you asserted a business confidentiality claim for portions of those documents. As you were informed by telephone on April 7, 1985, we are now in the process of making a determination of whether any of the information subject to your claim is entitled to confidential treatment.

Pursuant to 40 CFR §2.204(d) and (e), your company has the right to submit comments in support of its claim of confidentiality. These comments must be received by this office no later than fifteen working days following receipt of this notice. The comments should be addressed to Robert Schaefer, Regional Counsel, U.S. Environmental Protection Agency, Region V, 230 S. Dearborn Street, Chicago, Illinois 60604 to the attention of Bett Nelson. Failure to comment within fifteen working days will be construed as a waiver of your claim of confidentiality under 40 CFR §2.204(a)(1). Should extraordinary circumstances necessitate a time extension, please refer to the procedures stated at 40 CFR §2.205(b) which must be initiated prior to the expiration of the fifteen working days.

Please include in your comments complete information on the following:

1. The portions of the documents which Ciba-Geigy still asserts are entitled to confidential treatment (e.g., certain pages only of the document dated April 24, 1985; certain portions only of the document dated March 25, 1986);
2. The period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specified event, or indefinitely);
3. The extent to which the information claimed to be confidential has been disclosed to organizations or individuals other than EPA and its agents;
4. Measures which have been taken by Ciba-Geigy to guard against undesired disclosure of the information contained in the revision;
5. Pertinent confidentiality determinations, if any, by EPA or any other Federal agency or court (supply a copy of any such determination, or reference to it, if available);
6. Whether Ciba-Geigy asserts that disclosure of the information would be likely to result in substantial harmful effects on its competitive position and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

The burden of proving that the information subject to a claim of confidentiality is entitled to confidential treatment is on the party asserting the claim. 40 CFR §2.208(e)(1). Consequently, substantiation consisting of merely a brief, conclusory statement that disclosure could reveal trade secrets, financial, or commercial information to Ciba-Geigy's competitors is an insufficient basis for a determination that release of any or all of the information in the revision would cause harm to Ciba-Geigy's competitive position.

Specific information is required to support your claim. You should explain for each item claimed as confidential how release of this information could substantially harm Ciba-Geigy's competitive position. For example, if you assert that knowledge of a particular item would reveal a trade secret you should explain exactly what the trade secret is, why it is not general

knowledge, and how release of it could be used to harm your competitive position. For additional guidance, I suggest that you familiarize yourself with the provisions in 40 CFR Part 2 concerning business confidentiality.

You may also assert a business confidentiality claim covering all or part of any comments which you submit to substantiate your claim. These comments claimed as confidential should be clearly identified. Comments that have been indicated as confidential are entitled to confidential treatment and will not be disclosed by U.S. EPA without your consent unless ordered by a Federal court. See, 40 CFR §2.205(c).

Please contact Rett Nelson, Assistant Regional Counsel, at (312) 886-6852, if you have any questions.

Sincerely yours,

Robert B. Schaefer
Regional Counsel

bcc: A. Bloom (5HS)
S. Johnson (5NE)

EPA:RC:SWERB:RNELSON:Desiree':4/8/86:DISK#5

TZN
4-10-86

all
4-11/86

mg
4/11/86

4/14/86

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION V

STAFF ATTORNEY TLN 8-6-86
SECTION CHIEF WLR 8-11-86
DEPUTY REG. COUNSEL RAF 8/13/86
REGIONAL COUNSEL 8/13/86
OTHER _____
OTHER _____

IN RE:)
CIBA-GEIGY CORPORATION) REGIONAL COUNSEL'S DETERMINATION
MID 067-352-989) OF LEGAL ISSUES IN CLAIM OF
) BUSINESS CONFIDENTIALITY
)

PREAMBLE

Pursuant to 40 C.F.R. §2.204(a)(2), the U.S. Environmental Protection Agency (U.S. EPA) desires to determine whether certain information that CIBA-GEIGY Corporation (CIBA-GEIGY) has submitted constitutes confidential business information.

FINDINGS OF FACT

CIBA-GEIGY owns and/or operates several subsidiary operations, including one in Region V known as Ren Plastics. Ren Plastics is located at 4917 Dawn Avenue, East Lansing, Michigan.

CIBA-GEIGY participates in a number of industries, including production of pharmaceuticals, textile dyes, and specialty chemicals. Operation of several of these industries necessitates the handling of hazardous wastes. CIBA-GEIGY must therefore ensure that its facilities comply with the applicable provisions of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§6901 et seq.

In order to comply with RCRA, a facility must, inter alia, demonstrate financial responsibility for closure and post-closure cost and demonstrate liability coverage for sudden and non-sudden accidental occurrences.

In order to make this demonstration, CIBA-GEIGY submitted financial documents on April 24, 1985 based on the year ending 1984 and covering the year 1985. CIBA-GEIGY also submitted financial documents on March 25, 1986 based on the year ending 1985 and covering the year 1986. CIBA-GEIGY claimed that portions of both of these submittals were entitled to treatment as confidential business information.

Specifically, CIBA-GEIGY claimed these portions as business confidential: for the April 24, 1985 submittal, the numerical figures entered on lines 2-8 inclusive, and those in the footnote to line 3, on page 2 of the Letter From Chief Financial Officer; and, for the March 25, 1986 submittal, the numerical figures entered on lines 4-10 inclusive, and those in the footnote to line 5, on page 2 of the Letter From Chief Financial Officer.

On April 16, 1986, U.S. EPA sent a letter notifying CIBA-GEIGY of the opportunity to submit comments in support of its claim of confidentiality pursuant to 40 C.F.R. §2.204(d) and (e). CIBA-GEIGY received that letter on April 21, 1986, and

submitted substantive comments on May 8, 1986. CIBA-GEIGY claimed the comments were to be treated as confidential as well.

DETERMINATIONS

Upon review of CIBA-GEIGY's substantive comments, U.S. EPA has determined that those portions of CIBA-GEIGY's financial documents claimed as confidential do constitute confidential business information. This determination expresses no opinion on whether or not CIBA-GEIGY has adequately demonstrated that it meets the financial requirements of RCRA.

The information submitted meets all the criteria for confidential treatment imposed by 40 C.F.R. §2.208:

(a) CIBA-GEIGY has asserted a business confidentiality claim which has not expired by its terms, nor been waived or withdrawn.

(b) CIBA-GEIGY has satisfactorily shown that it has taken and intends to continue taking reasonable measures to protect the confidentiality of the information. CIBA-GEIGY does business on the basis that its financial information is confidential. Submissions of financial information to federal and state agencies, when required, are accompanied by a claim of confidentiality as a matter of policy.

Since CIBA-GEIGY is not a publicly-owned company, it is not required to file financial information with the Securities

and Exchange Commission. CIBA-GEIGY does not release financial information or financial statements, at any time, to the general public.

Financial information of CIBA-GEIGY is not released unless the recipient of the information agrees to maintain the confidentiality of this information. This has been the long standing practice of CIBA-GEIGY and has been honored by the members of the financial community with whom CIBA-GEIGY does business. In accordance with this policy, CIBA-GEIGY restricts its borrowings to a small segment of the financial community, and requires that its notes and other capital offerings be offered only to a limited list of institutional investors.

In other business contexts, it is CIBA-GEIGY's policy not to disclose financial information and, if disclosure is necessary, to disclose financial information only pursuant to an executed confidentiality agreement.

(c) Short of discovery based on a showing of special need in a judicial proceeding, persons other than governmental bodies or authorized CIBA-GEIGY employees cannot legitimately obtain the information without CIBA-GEIGY's consent.

(d) No statute specifically requires disclosure of the information. The Freedom of Information Act expressly exempts confidential business information from public disclosure.

5 U.S.C §552(b)(4).

(e) Because CIBA-GEIGY did not voluntarily release the information contained in its submittal (see 40 C.F.R. §2.305(e)) but rather submitted it pursuant to U.S. EPA's request, CIBA-GEIGY must show that disclosure would substantially harm its competitive position. CIBA-GEIGY's May 8, 1986 comments adequately provide such a showing. If the information (which consists of figures for current assets, current liabilities, and tangible net worth) were available over several years, as it would be if CIBA-GEIGY continues to report this information pursuant to RCRA, then CIBA-GEIGY's competitors or financial analysts would be able to make reasonable estimates of the company's profitability. This information would be of value to CIBA-GEIGY's competitors, who could modify their business strategies based on such information and cause substantial harm to CIBA-GEIGY.

Pursuant to §2.205(c), the substantive comments submitted by CIBA-GEIGY are entitled to confidential treatment and will not be disclosed by U.S. EPA without the business's consent, unless disclosure is duly ordered by a Federal Court.

CONCLUSION

For the above reasons, the Office of Regional Counsel has determined that information concerning certain numerical figures in CIBA-GEIGY's April 24, 1986 and March 25, 1986 financial documents is confidential business information. In addition,

information contained in CIBA-GEIGY's May 8, 1986 substantive comments is confidential business information. As such, the information shall be unavailable to the public to the full extent authorized by law. This determination constitutes final agency action subject to judicial review under Chapter 7 of Title 5, United States Code.

Robert B. Schaefer
Regional Counsel

Chicago, Illinois
August _____, 1986

July 18, 1985

Mr. Michael Munsell
Ciba Geigy Corporation
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID 067352989

Dear Mr. Munsell:

On July 17, 1985, staff of the Department of Natural Resources conducted an investigation of your facility located at 4917 Dawn Avenue in East Lansing, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

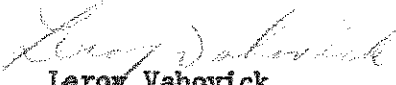
This inspection revealed that your facility was in compliance with the RCRA requirements evaluated at the time of the inspection. Compliance with these requirements does not limit the applicability of other provisions of the RCRA regulations. Enclosed is a copy of the inspection report for your information.

Also, a requirement of Michigan's Act 64, R299.6703 and R299.6704, requires that you provide secondary containment for areas of above-ground short-term storage of liquids or wastes which could generate free liquids during storage shall be paved, diked, curbed, or otherwise structurally enclosed so as to be able to contain not less than 150 percent of the liquid portion of the waste being stored. Your drum storage area must be maintained to provide secondary containment for the wastes being stored.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION


Leroy Vahovick
Water Quality Specialist
517-322-1687

LV/ms

Enclosure

cc: U.S. EPA - Region V /

11400

RCRA Inspection Report

EPA Identification Number: M 1 0 0 6 7 3 5 2 9 8 9

Installation Name: Ciba Geigy Corp

Location Address: 4917 Dawn Ave

City: East Lansing State: Mich 48823

Date of inspection: 7/1/85 Time of inspection (from) 2:45P (to) 3:45P

Person(s) interviewed	Title	Telephone
<u>Michael McGill</u>	<u>Int Health & Safety Coordinator</u>	<u>517 351 5900</u>

Inspector(s)	Agency/Title	Telephone
<u>Leroy Wahmick</u>	<u>Mich DNR Water Quality Sp</u>	<u>517 322-1687</u>

Installation Activity (mark only one box) Inspection Form(s)

- ☒ ~~Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation~~ A
- ☐ Treatment/Storage/Disposal (no generation or Transportation) A
- ☐ Generation and Transportation B, C
- ☐ Generation only B
- ☐ Transportation only C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	<input checked="" type="checkbox"/>			
b. Facility expansion?	<input checked="" type="checkbox"/>			
c. Change of owner or operator?	<input checked="" type="checkbox"/>			
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?				<u>Safety Data Sheet</u>
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?				<u>Product analysis</u>
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?				<u>Not App</u>
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<input checked="" type="checkbox"/>			
or				
b. i. Artificial or natural barrier around facility?		<input checked="" type="checkbox"/>		
and				
ii. Controlled entry?	<input checked="" type="checkbox"/>			
c. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<input checked="" type="checkbox"/>			<u>weekly</u>

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?			N/A	
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>			
iii. security devices?	<input checked="" type="checkbox"/>			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>			
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>			
ii. the name of the inspector?	<input checked="" type="checkbox"/>			
iii. a notation of the observations made?	<input checked="" type="checkbox"/>			
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>			
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>			
b. Job descriptions?	<input checked="" type="checkbox"/>			

YES NO NI R k s

c. Description of training?

☒ ☐ ☐ _____

d. Records of training?

☒ ☐ ☐ _____

e. Did facility personnel receive the required training by 5-19-81?

☐ ☐ ☐ _____

f. Do new personnel receive required training within six months?

☐ ☐ ☐ *N/A* _____

g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17

a. Special handling?

☒ ☐ ☐ _____

b. No smoking signs?

☒ ☐ ☐ _____

c. Separation and protection from ignition sources?

☒ ☐ ☐ _____

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

____ ✓ ____

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

✓ ____

b. Telephone or 2-way radios
at the scene of operations?

✓ ____

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ ____

Indicate the volume of water and/or foam available for fire control:

1000 GPM 2000 FT

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ EXTINGUISHER CO.

b. Is emergency equipment
maintained in operable
condition?

✓ ADT SERVICES

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

✓ ____

5. Is there adequate aisle space
for unobstructed movement?

✓ ____

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

✓ ____

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

None have occurred

Section G - CLOSURE AND POST CLOSURE (Part 265 part G)

	YES	NO	NI	Remarks
1. Closure 265.112				
a. Is the facility closure plan available for inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Does the plan identify:				
i. maximum extent unclosed during facility life?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
ii. maximum hazardous waste inventory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
iv. estimated year of closure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____ open ended
v. schedule of closure activities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	_____
*2. Post-Closure 265.118				
a. Is the post-closure plan available for inspection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
b. Does this plan contain:				
i. description of groundwater monitoring activities and frequencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
ii. description of maintenance activities and frequencies for				
AA. integrity of cap, final cover, or containment structures, where applicable	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
BB. facility monitoring equipment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
iii. name, address, and phone number of person or office to contact during post-closure care period?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
c. Has the post-closure period begun?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
d. Is the written post-closure cost estimate available? 265.144	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Applies only to disposal facilities.

Section I - USE A MANAGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Not Applicable</u>

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>6</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>None</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

YES NO NI Remarks

1. Is waste packaged in accordance with DOT regulations?
(Required prior to movement of hazardous waste off-site) 262.30
☒ ☐ ☐ _____
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials?
(Required for movement of hazardous waste off-site) 262.31 262.32
☒ ☐ ☐ _____
3. If required, are placards available to transporters of hazardous waste? 262.33
☒ ☐ ☐ _____
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box ☐ and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision
 - a. Is each container clearly marked with the start of accumulation date?
☒ ☐ ☐ _____
 - b. Have more than 90 days elapsed since the date inspected in (a)?
☒ ☐ ☐ _____
 - c. Do wastes remain in accumulation tanks for more than 90 days?
☐ ☐ ☒ _____
 - d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?
☒ ☐ ☐ _____

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

YES NO NI Remarks

1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40
☒ ☐ ☐ _____

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50
☐ ☒ ☐ _____
(If answered Yes, complete the following as applicable.)
 - a. Exporting Hazardous waste; has a generator:

✓ fcl

February 20, 1985

Mr. Michael Munsell,
Industrial Health/Safety Coordinator
Ren Plastics
CIBA-GEIGY Corporation
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID 067352989

Dear Mr. Munsell:

As part of the FY85 Hazardous Waste Management Cooperative Agreement with the U.S. EPA, the MDNR is obligated to review the adequacy of the closure and post-closure plans for all "major" and one third of the "non-major" hazardous waste treatment, storage and disposal facilities (TSDFs) in the State. All TSDFs which are licensed under 1979 P.A. 64, as amended, and those which are subject to the RCRA part 264/265 Subpart F groundwater monitoring requirements are defined as "major" facilities. EPA and the Department have also identified additional "major" facilities on the basis of the type and quantity of waste treated, generated or disposed of.

Your facility is considered a "non-major" facility. Therefore, please submit two up-to-date copies of the closure plan for your facility by March 22, 1985. The plans should be sent to the following address:

Hazardous Waste Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

If you have questions regarding this letter, please contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Robert E. Basch

Robert E. Basch, Supervisor
Lansing District
517-322-1300

REB/ms

cc: U.S. EPA
J. Bohunsky
A. Howard/C & E File

November 27, 1984

Mr. Michael L. Munsell
Industrial Health/Safety Coordinator
Ran Plastics
Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID 067352989

Dear Mr. Munsell:

The Department of Natural Resources has received your letter dated November 14, 1984 in response to the violation found during the October 23, 1984 inspection, which this Department performed as a representative of the U.S. Environmental Protection Agency to determine compliance with the provisions of the Resource Conservation and Recovery Act, and the State Hazardous Waste Management Act, Act 64, P.A. 1979, as amended.

Your letter has addressed the concerns that were raised as a result of the inspections and is adequate demonstration of compliance with the provisions of the Act. Staff will return to your facility to verify compliance.

Should you have any questions, you may contact this office.

Sincerely,

HAZARDOUS WASTE DIVISION

Leroy Vahovick
Leroy Vahovick
Water Quality Specialist
517-322-1687

LV/ds

October 25, 1984

Mr. Michael Munsell
Industrial Health & Safety Coordinator
Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID 067352989

Gentlemen:

On October 23, 1984, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located at East Lansing, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

1. 265.16 No personnel training records were available at the time of the inspection. A copy of the RCRA requirements are enclosed for your information.

We request that you respond to this letter by November 15, 1984 providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please feel free to contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Leroy Vahovick
Leroy Vahovick
Water Quality Specialist
517-322-1687

LV/ms

Enclosure

cc: Hazardous Waste Division
U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: M I D 0 6 7 3 5 2 9 8 9

Installation Name: Ciba-Geigy Corp

Location Address: 4917 Dawn Ave

City: East Lansing State: Mich 48823

Date of inspection: 10/23/84 Time of inspection (from) 2:30p (to) 3:30p

Person(s) interviewed	Title	Telephone
<u>Michael Morrell</u>	<u>Industrial/Hazardous Safety Coordinator</u>	<u>517-351-5900</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Leroy Wahnecke</u>	<u>Mich DDE with Geigy</u>	<u>517-322-1687</u>
_____	_____	_____

Installation Activity (mark only one box)

Inspection Form(s)

☒ ~~Treatment/Storage/Disposal per 40 CFR 265.1 and/or~~
~~Generation and/or Transportation~~

☐ Treatment/Storage/Disposal (no generation or Transportation)

☐ Generation and Transportation

☐ Generation only

☐ Transportation only

A

A

B, C

B

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

	YES	NO	NI*	Remarks
1. Has the Regional Administrator been notified regarding: 265.12				
a. Receipt of hazardous waste from a foreign source?	<input checked="" type="checkbox"/>			
b. Facility expansion?	<input checked="" type="checkbox"/>			
c. Change of owner or operator?	<input checked="" type="checkbox"/>			
2. General Waste Analysis: 265.13				
a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<input checked="" type="checkbox"/>			
b. Does the owner or operator have a detailed waste analysis plan on file at the facility?				<i>analysis is based on knowledge of the product</i>
c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?			<i>N/A</i>	
3. Security - Do security measures include: (if applicable) 265.14				
a. 24-Hour surveillance?	<input checked="" type="checkbox"/>			
or				
b. i. Artificial or natural barrier around facility?	<input checked="" type="checkbox"/>			
and				
ii. Controlled entry?	<input checked="" type="checkbox"/>			
c. Danger sign(s) at entrance?	<input checked="" type="checkbox"/>			
4. Owner or operator inspections: 265.15				
a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?	<input checked="" type="checkbox"/>			

*Not Inspected

	YES	NO	NI	Remarks
b. Does the owner or operator have an inspection schedule at the facility?	<input checked="" type="checkbox"/>			
c. If so, does the schedule address the inspection of the following items:				
i. monitoring equipment?			<i>N/A</i>	
ii. safety and emergency equipment?	<input checked="" type="checkbox"/>			
iii. security devices?	<input checked="" type="checkbox"/>			
iv. operating and structural equipment (i.e. dikes, pumps, etc.)?	<input checked="" type="checkbox"/>			
v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?	<input checked="" type="checkbox"/>			
vi. inspection frequency (based upon the possible deterioration rate of the equipment)?	<input checked="" type="checkbox"/>			<i>daily but logged monthly</i>
d. Are areas subject to spills inspected daily when in use?	<input checked="" type="checkbox"/>			
e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?	<input checked="" type="checkbox"/>			
f. Does the inspection log contain the following information:				
i. the date and time of the inspection?	<input checked="" type="checkbox"/>			
ii. the name of the inspector?	<input checked="" type="checkbox"/>			
iii. a notation of the observations made?	<input checked="" type="checkbox"/>			
iv. the date and nature of any repairs or remedial actions?	<input checked="" type="checkbox"/>			
5. Do personnel training records include: 265.16				
a. Job titles?	<input checked="" type="checkbox"/>			
b. Job descriptions?	<input checked="" type="checkbox"/>			

YES NO NI Remarks

c. Description of training?

✓

d. Records of training?

✓

e. Did facility personnel receive the required training by 5-19-81?

N/A

f. Do new personnel receive required training within six months?

N/A

g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17

a. Special handling?

✓

b. No smoking signs?

✓

c. Separation and protection from ignition sources?

✓

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

YES NO NI Remarks

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

 ✓

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

 HOT alarm

b. Telephone or 2-way radios
at the scene of operations?

 ✓ phone

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

 ✓

Indicate the volume of water and/or foam available for fire control:

Marietta Twp Water Supply

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

 ✓

b. Is emergency equipment
maintained in operable
condition?

 ✓

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

 ✓

5. Is there adequate aisle space
for unobstructed movement?

 ✓

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

 ✓

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓ _ _

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓ _ _

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓ _ _

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓ _ _

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓ _ _

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓ _ _

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	None have occurred
--------------------------	--------------------------	-------------------------------------	--------------------

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

☒ ☐ ☐ _____

b. Does the plan identify:

i. maximum extent unclosed during facility life?

_____ *entire operations* _____

ii. maximum hazardous waste inventory?

☒ ☐ ☐ _____

iv. estimated year of closure?

☒ ☐ ☐ *open ended* _____

v. schedule of closure activities?

☒ ☐ ☐ _____

c. Has closure begun?

_____ ☒ ☐ _____

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

_____ ☐ ☐ _____

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

_____ ☐ ☐ _____

ii. description of maintenance activities and frequencies for

AA. integrity of cap, final cover, or containment structures, where applicable

_____ ☐ ☐ _____

BB. facility monitoring equipment

_____ ☐ ☐ _____

iii. name, address, and phone number of person or office to contact during post-closure care period?

_____ ☐ ☐ _____

c. Has the post-closure period begun?

_____ ☐ ☐ _____

d. Is the written post-closure cost estimate available? 265.144

_____ ☐ ☐ _____

*Applies only to disposal facilities.

Section I - USE AND MANAGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

- | | | | | | |
|---|-----|-------|-------|-------|-------|
| 1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192 | N/A | _____ | _____ | _____ | _____ |
| 2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures? | | _____ | _____ | _____ | _____ |
| 3. Do continuous feed systems have a waste-feed cutoff? | | _____ | _____ | _____ | _____ |
| 4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193 | | _____ | _____ | _____ | _____ |
| 5. Are required daily and weekly inspections done? 265.194 | | _____ | _____ | _____ | _____ |
| 6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198
Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) | | _____ | _____ | _____ | _____ |
| 7. Are incompatible wastes stored in separate tanks? 265.199
(If not, the provisions of 40 CFR 265.17(b) apply.) | | _____ | _____ | _____ | _____ |
| 8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes? | | _____ | _____ | _____ | _____ |

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>7</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>None</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				

YES NO NI Remarks

i. Notified the Administrator in writing?

____ *N/A* _____

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

iii. Met the Manifest requirements?

b. Importing Hazardous Waste; has the generator met the manifest requirements?

Y E.S.
2-8-84

December 28, 1983

Michael L. Munsell
Industrial Health/Safety Coordinator
Ren Plastics
Ciba-Geigy Corporation Ren Plastics
4917 Dawn Avenue
East Lansing, MI 48823

Re: MID067352989

Dear Mr. Munsell:

The Department of Natural Resources has received the material you submitted on December 19, 1983 in response to deficiencies revealed in the May 12, 1983 inspection, which this Department performed as a representative of the U.S. Environmental Protection Agency to determine compliance with the provisions of the Resource Conservation and Recovery Act, and the State Hazardous Waste Management Act, Act 64, P.A. 1979, as amended.

Your submittal has addressed the concerns that were raised as a result of the inspection, and is adequate demonstration of compliance with the provisions of the Act.

Should you have any questions, you may contact this office.

Sincerely,

HAZARDOUS WASTE DIVISION

Leroy Vahevic
Water Quality Specialist
517-322-1687

LV:mj

cc: Hazardous Waste Division
U.S. EPA - Region V

GES
1-18-84
Status
Code X

December 9, 1983

Mr. Mike Munsell
Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, Michigan 48823

Re: MID067352989

Dear Mr. Munsell:

On November 29, 1983, staff of the Department of Natural Resources, acting as representatives of the United States Environmental Protection Agency, conducted an investigation of your facility located in East Lansing, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended.

As a result of that investigation, staff of the Department have determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

The closure plan was incomplete as required by 40 CFR Part 265.112(a); specifically, the estimated year of closure and the schedule of closure.

We request that you respond to this letter by January 3, 1984, providing documentation to this office regarding those actions taken to correct these violations.

If you have any questions regarding this matter, please contact me.

Sincerely,

HAZARDOUS WASTE DIVISION

Leroy Vahovick
Water Quality Specialist
517-322-1687

LV/sp

cc: Hazardous Waste Division
U.S. EPA - Region V

RCRA Inspection Report

EPA Identification Number: M I D 0 6 7 3 5 2 9 8 9

Installation Name: Ciba-Geigy Corp

Location Address: 4917 Dawn Ave

City: East Lansing State: Mich

Date of inspection: 11/29/83 Time of inspection (from) 1:45P (to) _____

Person(s) interviewed	Title	Telephone
<u>Mike Munsell</u>	<u>Ind Health Serv Coordinator</u>	<u>517-351-5900</u>
<u>Tony Cianciarulo</u>	<u>Max plant support</u>	_____

Inspector(s)	Agency/Title	Telephone
<u>Leroy Dabovich</u>	<u>Mich DNR water quality spl</u>	<u>517 322-1687</u>

Installation Activity (mark only one box) Inspection Form(s)

- | | |
|--|----------|
| <input checked="" type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | <u>A</u> |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

____ ✓ ____

b. Facility expansion?

____ ✓ ____

c. Change of owner or operator?

____ ✓ ____

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

✓ ____ ____

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

✓ ____ ____

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

✓ ____ ____

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?

____ ✓ ____

b. i. Artificial or natural barrier around facility?

✓ ____ ____

and
ii. Controlled entry?

✓ ____ ____

c. Danger sign(s) at entrance?

✓ ____ ____

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

✓ ____ ____

*18 hr surveillance
+ 7
fenced*

*Not Inspected

YES NO NI Remarks

b. Does the owner or operator have an inspection schedule at the facility?

☒ ☐ ☐ _____

c. If so, does the schedule address the inspection of the following items:

i. monitoring equipment?

☐ ☐ ☐ Not Applicable

ii. safety and emergency equipment?

☒ ☐ ☐ _____

iii. security devices?

☒ ☐ ☐ alarm system
ADT

iv. operating and structural equipment (i.e. dikes, pumps, etc.)?

☐ ☐ ☐ Manhole

v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?

☐ ☐ ☐ Leak of barrels

vi. inspection frequency (based upon the possible deterioration rate of the equipment)?

☒ ☐ ☐ each day

d. Are areas subject to spills inspected daily when in use?

☒ ☐ ☐ _____

e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?

☒ ☐ ☐ _____

f. Does the inspection log contain the following information:

i. the date and time of the inspection?

☒ ☐ ☐ _____

ii. the name of the inspector?

☒ ☐ ☐ _____

iii. a notation of the observations made?

☒ ☐ ☐ _____

iv. the date and nature of any repairs or remedial actions?

☒ ☐ ☐ _____

5. Do personnel training records include: 265.16

a. Job titles?

☒ ☐ ☐ _____

b. Job descriptions?

☒ ☐ ☐ _____

	YES	NO	NI	Remarks
c. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. Did facility personnel receive the required training by 5-19-81?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Not Applicable</i>
f. Do new personnel receive required training within six months?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Not Applicable</i>
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Kept current in each persons file</i>
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17				
a. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>Hazardous</i>
b. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

_____ ✓ _____

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

✓ _____

ADT

b. Telephone or 2-way radios
at the scene of operations?

✓ _____

phone

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ _____

Indicate the volume of water and/or foam available for fire control:

Marindian Trup water supply

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ _____

b. Is emergency equipment
maintained in operable
condition?

✓ _____

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

✓ _____

5. Is there adequate aisle space
for unobstructed movement?

✓ _____

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

✓ _____

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

	YES	NO	NI	Remarks
1. Does the Contingency Plan contain the following information: 265.52				
a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<input checked="" type="checkbox"/>			
b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<input checked="" type="checkbox"/>			
c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<input checked="" type="checkbox"/>			
d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<input checked="" type="checkbox"/>			
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	<input checked="" type="checkbox"/>			
2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53	<input checked="" type="checkbox"/>			

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓

✓

✓

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

_____ NOT Applicable

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Are records of past shipments retained for 3 years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72				
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	NOT APP
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

Section G - CLOSURE AND POST CLOSURE (Part 265 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

☒ ☐ ☐ _____

b. Does the plan identify:

i. maximum extent unclosed during facility life?

☒ ☒ ☐ To be revised

ii. maximum hazardous waste inventory?

☒ ☐ ☐ _____

iv. estimated year of closure?

☐ ☒ ☐ To be revised

v. schedule of closure activities?

☐ ☒ ☐ To be revised

c. Has closure begun?

☐ ☒ ☐ _____

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

☐ ☐ ☐ Not Applicable

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

☐ ☐ ☐ _____

ii. description of maintenance activities and frequencies for

☐ ☐ ☐ _____

AA. integrity of cap, final cover, or containment structures, where applicable

☐ ☐ ☐ _____

BB. facility monitoring equipment

☐ ☐ ☐ _____

iii. name, address, and phone number of person or office to contact during post-closure care period?

☐ ☐ ☐ _____

c. Has the post-closure period begun?

☐ ☐ ☐ _____

d. Is the written post-closure cost estimate available? 265.144

☐ ☐ ☐ _____

*Applies only to disposal facilities.

Section I - USE AND MANGEMENT OF CONTAINERS (Part 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>10</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>			
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>			
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>			
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>None</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

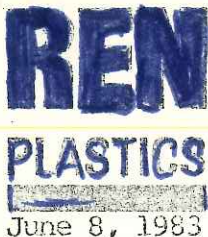
	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Have more than 90 days elapsed since the date inspected in (a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Do wastes remain in accumulation tanks for more than 90 days?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Not Applicable
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(If answered Yes, complete the following as applicable.)				
a. Exporting Hazardous waste; has a generator:				



4917 Dawn Avenue
East Lansing, Michigan 48823
Telephone 517 351-5900

a CIBA-GEIGY Company

MID067352989

Michigan Department of Natural Resources
P. O. Box 30028
Lansing, MI 48909

Attention: Leroy Vahovick
Water Quality Specialist

Dear Mr. Vahovick:

In response to your letter of May 9, 1983, enclosed please find the following documents:

1. Names and job titles of individuals who received initial training in Hazardous Waste and documentation of training.
2. A job description suitable for an hourly person working with Hazardous Waste.
3. A job description of a supervisor of the individual named in item 2.
4. Documentation of continuing training which occurred in 1982.
5. Forms which will be used to document future training sessions, both formal and on the job.
6. A copy of a form documenting a recent training session.

I hope that you find the above named information to be adequate. If not, please notify me so that further steps may be taken to correct this situation.

Very truly yours,

Michael L. Munsell
Industrial Health/Safety Coordinator
Ren Plastics
CIBA-GEIGY Corporation

MLM/ig
2/A-25

cc. EPA
Bokonsky

RECEIVED

JUN 13 1983

Water Qual.-Dist. II

TRAINING DOCUMENTATION FORM

This is to certify that the following individuals have been trained in HAZARDOUS WASTE MANAGEMENT in accordance with guidelines set by Corporate Policy and Federal Regulations:

NAME	TITLE	DATE	TYPE OF TRAINING (initial or continuing)
Mike Munsell	Industrial Health & Safety Coordinator		Continuing <i>M.M.</i>
Dick St. John	Plant Engineer <i>P. St. John</i>		Initial
Becky Henry	Associate Chemist <i>Becky Henry</i>		Initial
Gary Smith	Quality Control Supervisor <i>G. Smith</i>		Initial
Lee Hill	Purchasing Agent <i>M. Lee Hill</i>		Initial
Serge R. Lopoukhine	Corporate Rep.		Initial
W. Dibeau	Assembler <i>Wayne Dibeau</i>		Initial
L. Keller	Assembler <i>Leslie Keller</i>		Initial <i>L.K.</i>
K. King	Assembler <i>Mike King</i>		Initial <i>Mike King</i>
M. Miller	Assembler		Initial
H. Fulghun	Assembler		Initial
J. Tomlian	Assembler		Initial
M. Apter	Assembler <i>Mark Apter</i>		Initial <i>M.A.</i>
G. Everts	Assembler <i>Gene Everts</i>		Initial <i>G.E.</i>

Instructors *Michael S. Swenson* *[Signature]*

SIGNED: *Michael L. Munsell*
Hazardous Waste Manager
May 14, 1981

JOB DESCRIPTION
FOR
EMPLOYEES WHO HANDLE WASTE MATERIALS AT REN PLASTICS

1. Meet the Minimum Qualifications needed to work in the compounding and mixing department, the kettle department, canning and packing department, tubing department, shipping department, receiving department, maintenance department, etc.
2. Under the supervision of the Industrial Health and Safety Coordinator or a person designated by him, perform such duties as placing discarded waste materials in storage containers, labeling the containers, moving the containers to storage areas, etc.
3. Report any spills of waste materials and any unsafe conditions caused by these materials to the Industrial Health and Safety Coordinator.

CIBA-GEIGY CORPORATION
POSITION DESCRIPTION

Position Title: Industrial Health/Safety Coordinator
Budget Center Number: RF 3175-00
Job Code:
Incumbent: Mike Munsell
Analyst: Rosekrans/Tartaglione
Div./Plant/Corp. P & A Division
Dept: Ren Plastics
Interview Date: 10/82
Organization Unit: Applied Plastics
Approvals: 1) M. Z. Munsell
2) N. L. Tartaglione
Location: East Lansing, Michigan
3) _____
Reports to: Manager, Technical and
(Title) Manufacturing Support

Summary of Position:

Position is responsible for making recommendations for the design, successful implementation and coordination of effective programs to safeguard the health of company employees, the environment, and other persons and agencies that may deal with the company's products in transportation, the wastes generated in their manufacture, or the hazards implicit in their use. Incumbent is responsible for the interpretation of regulations from all levels of government in the areas of health, safety, ecology, and transportation and the definition of their application to the company. Incumbent is responsible for making recommendations for the thorough and effective training of personnel at all levels in areas to allow for a high level of compliance with federal, state and local laws and regulations.

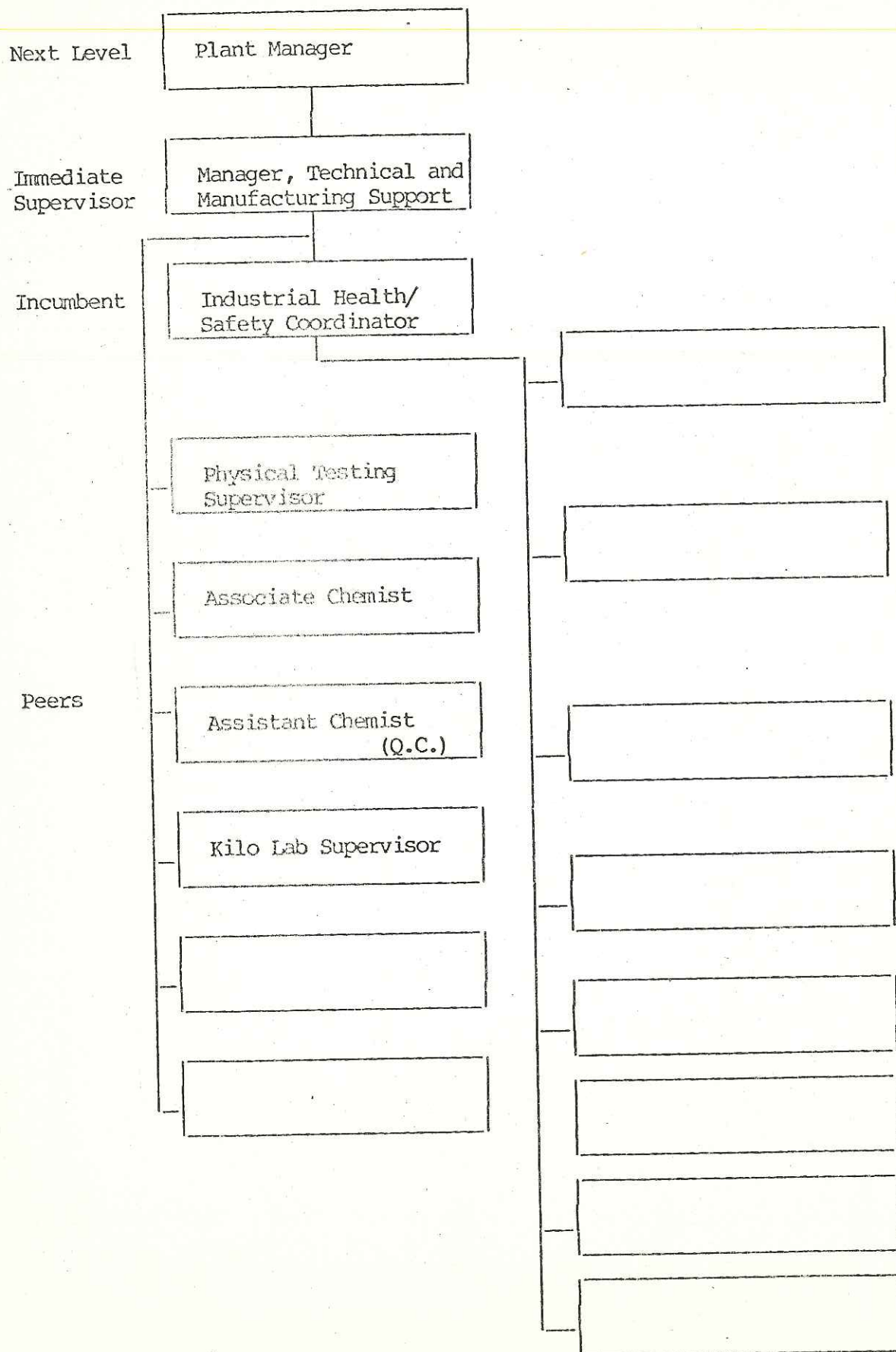
Dimensions:

Supervision (Direct/Indirect): 1 (Hourly)
Total Ren personnel (Indirect): 62
Safety-Medical Budget (Direct): \$10M
Equipment (Indirect): \$15M
Waste Disposal: \$40M

Title: Industrial Health Safety Coordinator

Incumbent: M. Munsell

ORGANIZATION:



Title: Industrial Health/Safety Coordinator

Incumbent: M. Munsell

Nature and Scope:

The Plastics and Additives Division is a part of CIBA-GEIGY Corporation, which is a wholly-owned subsidiary of CIBA-GEIGY Limited, Basle, Switzerland. The Division develops and markets an extensive line of chemical commodities and specialties including pigments, resins, additives, and applied plastic products. The applied plastic products are a forward integration, value added products, of resins and associated chemical products. The Applied Plastics Department is composed of three separate, comparatively independent and dissimilar business units: Ren Plastics, R & D Chemical, and Pipe Systems. This position is in Ren Plastics. This business develops and markets a wide range of products, mainly based on polymer chemistry, to a number of markets, including, for example, traditional tooling, modeling, foundry, potting and recreational.

Although the incumbent does not have accountability for any part of sales, failure to satisfactorily fulfill the responsibilities of this position could have immediate and severe consequences on the company's profitability ranging from: lost sales arising from the failure to obtain necessary permits in a timely fashion; repair or replacement of manufacturing equipment from lack of a safety consideration; to court ordered penalties for civil and criminal violations for failure to comply with regulations from federal, state or local levels of government. A more critical area is the damage potential to human health and well-being for both employees of the company and neighbors in the surrounding community that is inherent in our business, this potential is minimized with a thorough training program.

Incumbent reports to Manager, Technical and Manufacturing Support, providing support, as well as other members of plant management and company administrators in aspects of safety, industrial hygiene and TSCA programs. Incumbent must possess the unique skill of being able to persuade other personnel, such as above peer, at peer, and below peer levels to cooperate in the achievement of overall goals and objectives.

SAFETY:

Incumbent has full responsibility for assuring that the facilities and employees conform in all respects to the Occupational Safety and Health Act, as applicable to government standards. This is accomplished by the design and implementation of an inspection and audit system which is utilized on a periodic basis to determine the compliance status of the facilities. In this regard, the incumbent has a thorough working knowledge of all applicable laws, rules and regulations, and be able to equate same with particular facilities. When violations are identified as a result of inspection and audit, the incumbent works closely with appropriate department managers, plant engineers, to assure continuity of function within the least amount of time required, correcting the violations with minimum disruption and expenditure. The incumbent reviews all equipment installations, processes/procedures, and revisions from a safety standpoint prior to utilization.

Incumbent is responsible for the design and helps in the implementation of safety training, and education programs for all employees. Such programs include, but are not limited to first aid, disaster, fork truck operation, and respirator equipment/use. Incumbent may instruct such courses or provide retention of qualified external sources for instructional purposes.

Incumbent will design and implement a valid system of accident investigation followup, and make appropriate recommendations.

Title: Industrial Health/Safety Coordinator

Incumbent: M. Munsell

INDUSTRIAL HYGIENE:

Incumbent has the responsibility for designing and implementing a thorough program of industrial hygiene monitoring within the facilities. Incumbent must determine what monitoring tests and data are required, procures necessary equipment to conduct the monitoring programs, records results, and determines significance in relation to the health and safety of employees, makes recommendations for correction of deficiencies, and is responsible for working closely with Manager, Personnel in areas pertaining to pre/post physical employment health examinations, and accident reporting.

ENVIRONMENTAL REGULATIONS:

Incumbent must be thoroughly familiar with environmental regulations that may impact the company's operation. These include regulations from both the federal and state levels of government pertaining to air quality, water quality, toxic substances, and wastes generated from plant operation. Incumbent acts as a liaison between regulatory agencies and the company, consults with outside counsel in matters which may adversely impact the company and is responsible for the preparation of various permits, reports, and position statements as may be required. Incumbent is responsible for the design of programs to comply with applicable regulations either through training of personnel or recommending alterations of operating parameters. Incumbent must keep abreast of products developed to insure that research avenues do not conflict with regulatory restrictions. In the area of waste, incumbent is specifically responsible for locating disposal sites and coordinating the approval of and disposal of waste streams.

Incumbent must become familiar with the whole range of products manufactured and sold by Ren to make intelligent assessments of what kinds of toxicity testing are required in the short term as well as what kinds of toxicity related problems might develop in the future. Educational background and accumulated job knowledge must be sufficient to enable incumbent to understand the development of new products. Incumbent must assist in identifying potential toxicity problems, drawing them to the attention of appropriate staff in the particular department concerned, and assist in solving the problems wherever possible. Incumbent must arrange for analysis of product impurities in instances where they might have an appreciable effect on the toxicity of a product.

Incumbent is responsible to see that the materials being shipped by the company comply with hazardous materials regulations as set forth by the Department of Transportation. These include defining the correct hazard class, labeling and marking requirements, and correctness of shipping papers. The incumbent maintains the balance between compliance with the law and flexibility in meeting company needs.

To maintain state-of-the-art, incumbent is recipient of various internal and external reports, providing vital information relevant to effective performance and for making proper recommendations. For example, Bureau of National Affairs Safety/Health Report, various Corporate reports, and National Institute of Occupational Safety and Health Intelligence Bulletin.

Title: Industrial Health/Safety Coordinator

Incumbent: M. Munsell

Accountabilities and Measures:

1. Contributes to uninterrupted operations and prevention of injury or property damage by timely inspections of work areas, hazards, surveys, on-site testing and issuance of work permits.
 - 1.a. Timeliness of inspections.
 - 1.b. Accident frequency rate.
 - 1.c. Property damage and loss of production time.
 - 1.d. Comparison of current year-to-date with preceding years.
 - 1.e. Number of permits issued, no lost production due to lack of permits.
2. Contributes to plant efforts to comply with applicable Corporate, State and Federal (OSHA) rules and regulations by instruction of operating personnel, coordination with supervision and conducting of health, safety and environmental surveys.
 - 2.a. Reports by OSHA personnel of on-site inspections.
 - 2.b. Number of contacts with supervision on formalities of rules and regulations.
 - 2.c. Number of surveys conducted per year.
3. Insure that Ren Plastics does not violate environmental or transportation law or any other Federal/State legislation that might be enacted.
 - 3.a. Feedback from P & A Division.
 - 3.b. Feedback from Safety, Health and Ecology Department (SH&E).
 - 3.c. Absence of Government citations against company.
 - 3.d. Information gained from the Federal Register.
4. Insure that Ren Plastics Management and Operational Department are kept abreast of new regulatory developments and their impact on our present and future business.
 - 4.a. Quality of communications issues describing regulatory impact.
 - 4.b. Number of contacts with above personnel.

CIBA-GEIGY CORPORATION

APPLICATION FOR INSIDE/OUTSIDE SEMINAR ATTENDANCE

(Attach descriptive brochure, registration form and other pertinent information.)

NAME <i>MIKE MUNSELL</i>		DATE <i>8/12/82</i>
DIVISION <i>P+A-REN</i>	COST CENTER <i>RF 3175</i>	POSITION <i>HEALTH COORDINATOR</i>
LOCATION <i>LANSING</i>		TELEPHONE

SEMINAR TITLE AND NUMBER, IF ANY <i>INDUSTRIAL WASTE MANAGEMENT STRATEGIES</i>	
SPONSORING ORGANIZATION <i>CECOS INTERNATIONAL INC.</i>	
DATES (S) <i>9/8+9/82</i>	LOCATION <i>O'WARE HILTON</i>
REGISTRATION FEE <i>\$50</i>	EXPENSES* (Travel, Hotel, etc.): <i>\$500</i>

*Employees are responsible for making their hotel/travel arrangements through the Receptionist.

TO BE COMPLETED BY SUPERVISOR	
IDENTIFY THE SPECIFIC DEVELOPMENTAL NEEDS THAT YOU EXPECT TO BE MET BY ATTENDANCE AT THIS SEMINAR:	
<i>TO COMPLY WITH RCRA TRAINING REQUIREMENTS</i>	
<i>STAY CURRENT WITH NEW DEVELOPEMENTS IN WASTE MANEGEME.</i>	

SUPERVISOR *A. N. Carrionado*
DEPARTMENT HEAD *N. L. [unclear] / 10/82*
PERSONNEL *[unclear]*

CERTIFICATE OF ATTENDANCE

This is to certify that _____

Mike Munnell

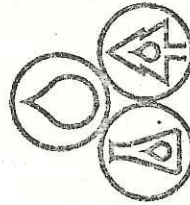
did attend and participate in the SEMINAR and WORKSHOP,

"An Assessment of Industrial Waste Management Strategies"

in Chicago, Illinois on September 8-9, 1982.

John M. Burke

JOHN M. BURKE
REGIONAL SALES TRAINING MANAGER
CECOS INTERNATIONAL



HAZARDOUS WASTE MANAGEMENT TRAINING

Name of Employee:

Job Title:

Job Description:

Trained in the following areas:

- ☐ Labeling, marking, placarding
- ☐ Waste storage, inventory
- ☐ Manifest
- ☐ Material handling
- ☐ Chemical hazards
- ☐ Emergency response
- ☐ Emergency equipment
 - ☐ Fire extinguishers
 - ☐ Respirators
 - ☐ Alarms

The person indicated above has received _____ (initial or continuing) training in these areas.

Date: _____ signed: _____

Hazardous Waste Manager

CIBA-GEIGY CORPORATION

APPLICATION FOR INSIDE/OUTSIDE SEMINAR ATTENDANCE

(Attach descriptive brochure, registration form and other pertinent information.)

NAME <i>Wayne Dibeau</i>		DATE <i>5/17/83</i>	
DIVISION <i>Ren Plastics</i>	COST CENTER	POSITION <i>Assembler - Hazardous Waste</i>	
LOCATION		TELEPHONE	

SEMINAR TITLE AND NUMBER, IF ANY <i>The Burial Ground</i>	
SPONSORING ORGANIZATION <i>SCA</i>	
DATES (S) <i>5/17/83</i>	LOCATION <i>Ren</i>
REGISTRATION FEE _____ EXPENSES* (Travel, Hotel, etc.): _____	

*Employees are responsible for making their hotel/travel arrangements through the Receptionist.

TO BE COMPLETED BY SUPERVISOR
IDENTIFY THE SPECIFIC DEVELOPMENTAL NEEDS THAT YOU EXPECT TO BE MET BY ATTENDANCE AT THIS SEMINAR.
<i>Defines Responsibilities for waste management through simulation of investigation of hazardous waste contamination caused by failure to dispose of waste properly</i>

SUPERVISOR

Mike Russell
EMPLOYEE
DEPARTMENT HEAD

PERSONNEL

Wayne Dibeau
Date
5/17/83

CIBA-GEIGY CORPORATION

APPLICATION FOR INSIDE/OUTSIDE SEMINAR ATTENDANCE

• (Attach descriptive brochure, registration form and other pertinent information.)

NAME		DATE
DIVISION	COST CENTER	POSITION
LOCATION	TELEPHONE	

SEMINAR TITLE AND NUMBER, IF ANY

SPONSORING ORGANIZATION

DATES (S)

LOCATION

REGISTRATION FEE _____ EXPENSES* (Travel, Hotel, etc.): _____

* Employees are responsible for making their hotel/travel arrangements through Technical Administrative Secretary.

TO BE COMPLETED BY SUPERVISOR

IDENTIFY THE SPECIFIC DEVELOPMENTAL NEEDS THAT YOU EXPECT TO BE MET BY ATTENDANCE AT THIS SEMINAR.

SUPERVISOR _____

DEPARTMENT HEAD _____

PERSONNEL _____

9-5
6 83
class III
Code X

MID 067 352 989

May 9, 1983

Mr. Mike Munsell
Industrial Health/Safety Coordinator
Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, Michigan

Dear Mr. Munsell:

On May 2, 1983, I conducted an inspection of your facility located at 4917 Dawn Avenue in Lansing to evaluate compliance of this facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended. The inspection report is enclosed for your information.

As a result of this inspection, it was determined that the above mentioned facility is deficient in Subtitle C of RCRA. Specifically, the personnel training records were not available for review, as required in 40 CFR 264.16(c&d).

You are hereby requested to respond to this letter by June 10, 1983, providing documentation to this office regarding those actions taken to correct this violation.

If you have any questions regarding this matter, please feel free to contact me at (517) 322-1687.

Sincerely,

HAZARDOUS WASTE DIVISION

Leroy Vahovick
Water Quality Specialist
Lansing District

LV/sp

cc: Bohunsky/Hazardous Waste Div.
U.S. EPA - Region V

Enclosure

YES 6-8-83

Class III
Code X

RCRA Inspection Report

EPA Identification Number: M 1 D 0 6 7 3 5 2 9 8 9

Installation Name: Ciba-Geigy Corp

Location Address: 4917 Daim Ave

City: East Lansing State: Mich

Date of inspection: 5/2/83 Time of inspection (from) 2:35^p (to) 4:00^p

Person(s) interviewed	Title	Telephone
<u>Mike Munsch</u>	<u>Ind Health Co-ordinator</u>	<u>517-351-5900</u>

<u>Tony Cianciarulli</u>	<u>Mgr. of Tech and Mfg Support</u>	<u>517-351-5900</u>
--------------------------	-------------------------------------	---------------------

Inspector(s)	Agency/Title	Telephone
--------------	--------------	-----------

<u>Leroy Vahovich</u>	<u>DNR Water Quality Sp1</u>	<u>517 322-1687</u>
-----------------------	------------------------------	---------------------

Installation Activity (mark only one box)

Inspection Form(s)

- ☒ ~~Treatment/Storage/Disposal~~ per 40 CFR 265.1 and/or ~~Generation and/or Transportation~~
- ☐ Treatment/Storage/Disposal (no generation or Transportation)
- ☐ Generation and Transportation
- ☐ Generation only
- ☐ Transportation only

A

A

B, C

B

C

INSPECTION FORM A

Section A: SCOPE OF INSPECTION.

1. Interim status standards for treatment storage or disposal of HAZARDOUS WASTES SUBJECT TO 40 CFR 265.1. Complete Inspection Form A sections B, C, D, E, and G.
2. Place an "X" in the box(es) corresponding to the facility's treatment, storage and disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3) Inspection Form A section(s)

S01	<input checked="" type="checkbox"/>	storage in containers	I
S02	<input type="checkbox"/>	storage in tanks	J
T01	<input type="checkbox"/>	treatment in tanks	J
S04	<input type="checkbox"/>	storage in surface impoundment	K,F
T02	<input type="checkbox"/>	treatment in surface impoundment	K,F
D83	<input type="checkbox"/>	disposal in surface impoundment	K,F
S03	<input type="checkbox"/>	storage in waste pile	L
D81	<input type="checkbox"/>	disposal by land application	M,F
D80	<input type="checkbox"/>	disposal in landfill	N,F
T03	<input type="checkbox"/>	treatment by incineration	O/P
T04	<input type="checkbox"/>	treatment in devices other than tanks, surface impoundments, or incinerators	Q

Other activities

GENERATOR	<input checked="" type="checkbox"/>	APPENDIX	GN
TRANSPORTER	<input type="checkbox"/>	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.
4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 40 CFR 265.1(c). Provide a brief rationale for the possible exclusion.

Section B: GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

YES NO NI* Remarks

1. Has the Regional Administrator been notified regarding: 265.12

a. Receipt of hazardous waste from a foreign source?

____ ✓ ____ None received

b. Facility expansion?

____ ____ ____

c. Change of owner or operator?

____ ____ ____

2. General Waste Analysis: 265.13

a. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

✓ ____ ____

b. Does the owner or operator have a detailed waste analysis plan on file at the facility?

✓ ____ ____

c. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

____ ____ ✓ No other waste handled

3. Security - Do security measures include: (if applicable) 265.14

a. 24-Hour surveillance?

✓ ____ ____

or

b. i. Artificial or natural barrier around facility?

✓ ____ ____ Artificial - Fenced

and

ii. Controlled entry?

✓ ____ ____

c. Danger sign(s) at entrance?

✓ ____ ____

4. Owner or operator inspections: 265.15

a. Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors, and discharges of hazardous waste that may affect human health or the environment?

✓ ____ ____ Walking with daily

Walk Through
Inspection

*Not Inspected

YES NO NI Remarks

- b. Does the owner or operator have an inspection schedule at the facility?
- c. If so, does the schedule address the inspection of the following items:
- i. monitoring equipment?
 - ii. safety and emergency equipment?
 - iii. security devices?
 - iv. operating and structural equipment (i.e. dikes, pumps, etc.)?
 - v. type of problems to be looked for during the inspection (e.g. leaky fitting, defective pump, etc.)?
 - vi. inspection frequency (based upon the possible deterioration rate of the equipment)?
- d. Are areas subject to spills inspected daily when in use?
- e. Does the owner or operator maintain an inspection log or summary of owner or operator inspections?
- f. Does the inspection log contain the following information:
- i. the date and time of the inspection?
 - ii. the name of the inspector?
 - iii. a notation of the observations made?
 - iv. the date and nature of any repairs or remedial actions?

YES	NO	NI	Remarks
<input checked="" type="checkbox"/>			
	<input checked="" type="checkbox"/>		None used
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			Concrete pad-sloped & contained sealed drain
		<input checked="" type="checkbox"/>	
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			Date
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			
<input checked="" type="checkbox"/>			
	<input checked="" type="checkbox"/>		Training 12/1981 No individual Training Records since

5. Do personnel training records include: 265.16

- a. Job titles?
- b. Job descriptions?

	YES	NO	NI	Remarks
c. Description of training?	—	<input checked="" type="checkbox"/>	—	
d. Records of training?	<input checked="" type="checkbox"/>	—	—	Some Training 8/
e. Did facility personnel receive the required training by 5-19-81?	<input checked="" type="checkbox"/>	—	—	" " "
f. Do new personnel receive required training within six months?	—	—	<input checked="" type="checkbox"/>	No New personnel
g. Do personnel training records indicate that personnel have taken part in an annual review of initial training?				
6. If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed? 265.17.				
a. Special handling?	<input checked="" type="checkbox"/>	—	—	Ignitable
b. No smoking signs?	<input checked="" type="checkbox"/>	—	—	
c. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	—	—	

Section C: PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

1. Maintenance and Operation
of Facility: 265.31

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

YES NO NI Remarks

— ☒ —

2. If required, does the facility
have the following equipment: 265.32

a. Internal communications or
alarm systems?

— ☒ —

Not necessary

b. Telephone or 2-way radios
at the scene of operations?

☒ —

*phone in storage
area.*

c. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

☒ —

*extinguishers, absorbent mat,
water supply*

Indicate the volume of water and/or foam available for fire control:

Meridian Tank water supply

3. Testing and Maintenance of
Emergency Equipment: 265.33

a. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

☒ —

weekly

b. Is emergency equipment
maintained in operable
condition?

☒ —

4. Has owner or operator provided
immediate access to internal
alarms? (if needed) 265.34

☒ —

5. Is there adequate aisle space
for unobstructed movement?

☒ —

6. Has the owner or operator attempted
to make arrangements with local
authorities in case of an emergency
at the facility?

☒ —

on file

Section D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

YES NO NI Remarks

1. Does the Contingency Plan contain the following information: 265.52

a. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

✓

b. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

✓

c. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

✓

d. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

✓

e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

Several copies

2. Are copies of the Contingency Plan available at the site and local emergency organizations? 265.53

✓

YES NO NI Remarks

3. Emergency Coordinator 265.55

- a. Is the facility Emergency Coordinator identified?
- b. Is coordinator familiar with all aspects of site operation and emergency procedures?
- c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

✓

✓

✓

4. Emergency Procedures 265.56

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

✓

*production line
low injury
not related to
hazardous waste*

Section E: MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING: (Part 265 Subpart E)

	YES	NO	NI	Remarks
** 1. Use of Manifest System 265.71				
a. Does the facility follow the procedures listed in §265.71 for processing each manifest? (Particularly sending a copy of the signed manifest back to the generator within 30 days after delivery.)			✓	do not receive waste from other sources
b. Are records of past shipments retained for 3 years?				
** 2. Does the owner or operator meet requirements regarding manifest discrepancies? 265.72			✓	SI NO NO
** Not applicable to owners or operators of on-site facilities that do not receive any waste from off-site sources.				
3. Operating Record 265.73				
a. Does the owner or operator maintain an operating record as required in 265.73?			✓	all barrel wastes are recorded as to their location on site.
b. Does the operating record contain the following information:				
i. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in 40 CFR Part 265 Appendix I?	✓			
ii. The location and quantity of each hazardous waste within the facility? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)	✓			
***iii. A map or diagram of each cell or disposal area				

*** only applies to disposal facilities

showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

✓

iv. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

determined in process

v. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

never used

vi. All closure and post closure costs as applicable?

4. Availability of Records 265.74

Are all facility records required under 40 CFR Part 265 available for inspection?

✓

5.**Unmanifested Waste Reports 265.76

a. Has the facility accepted any hazardous waste from an off-site generator subject to 40 CFR 262.20 without a manifest or shipping paper?

✓

None received

b. If "a" is yes, provide the identity of the source of the waste and a description of the quantity, type, and date received for each unmanifested hazardous waste shipment.

** Not applicable to owners or operators of on-site facilities that do not receive any hazardous from off-site sources.

Section F - GROUNDWATER MONITORING (Part 265 Subpart F)

Complete this section for facilities that treat, store, or dispose of hazardous waste in landfills, surface impoundments and/or by land treatment.

	YES	NO	NI	Remarks
1. Has the owner or operator of the facility implemented a groundwater monitoring system? 265.90	___	___	<input checked="" type="checkbox"/>	<u>hazard storage</u> <u>at source for</u> <u>generation.</u>
If "no", Skip to number 11.				
2. Has the owner or operator of the facility implemented an alternate groundwater monitoring system as described in 265.90(d)?	___	___	___	_____
If "yes", skip to number 12.				
If "no", continue				
3. Does the groundwater monitoring system meet the following requirements of 265.91:				
a. At least one well installed hydraulically up-gradient from the limit of the waste management area?	___	___	___	_____
Indicate the total number of up-gradient wells.				
b. At least three wells installed hydraulically down-gradient at the limit of the waste management area?	___	___	___	_____
Indicate the total number of downgradient wells.				
c. Are the number, locations, and depths of all wells sufficient to yield groundwater samples that are representative of groundwater under the facility?	___	___	___	_____

Sketch the locations of the wells relative to the waste management area.

	YES	NO	NI	Remarks
d. Are the monitoring wells constructed in accordance with 265.91(c) (e.g. properly cased, screened, etc.)?	___	___	___	_____
4. Has the owner or operator developed a written groundwater sampling and analysis plan that includes procedures and techniques for: 265.92				
a. Sample collection?	___	___	___	_____
b. Sample preservation and shipment?	___	___	___	_____
c. Analytical procedures?	___	___	___	_____
d. Chain of custody control?	___	___	___	_____
5. Does the owner or operator follow his groundwater sampling and analysis plan?	___	___	___	_____
6. Is the groundwater sampling and analysis plan maintained at the facility?	___	___	___	_____
7. Has the owner or operator determined the concentration or value of all the groundwater monitoring parameters of 265.92(b) in accordance with paragraphs c and d of 265.92?	___	___	___	_____

YES NO NI

Remarks

8. Has the owner or operator developed an outline of a comprehensive groundwater quality assesment program that is capable of determining: 265.93

a. Whether hazardous waste or hazardous waste constituents have entered the groundwater?

____ _

b. The rate and extent of migration of hazardous waste or hazardous waste constituents in the groundwater?

____ _

c. The concentration of hazardous waste or hazardous waste constituents in the groundwater?

____ _

*9. Has the owner or operator performed a statistical analysis of his groundwater monitoring data as required in 265.93(b)?

____ _ X

*10. Was there a statistically significant increase (or pH decrease) detected in any well?

____ _ X

a. If "yes," has the owner or operator responded in accordance with the procedures prescribed in 265.93 paragraphs c through f?

____ _ X

Skip to number 14

11. Has the owner or operator prepared a written groundwater monitoring waiver demonstration for the facility?

____ _

a. Is the waiver demonstration maintained at the facility?

____ _

b. Has the waiver demonstration been certified by a qualified geologist or geotechnical engineer?

____ _

Note: Inspectors should request a copy of the waiver document.

c. Skip questions 12, 13, and 14.

*These requirements do not take effect until the first 6 months after November 19, 1982. The latest date for compliance with these requirements is May 19, 1983.

	YES	NO	NI	Remarks
12. Has the owner or operator submitted an alternate groundwater monitoring system to the Regional Administrator?	_____	_____	_____	_____
a. Has the plan been certified by a qualified geologist or geotechnical engineer?	_____	_____	_____	_____
Note: If the plan for an alternate groundwater monitoring system was not submitted to the Regional Administrator the inspector should request a copy for review.				
13. Does the alternate groundwater monitoring plan address the requirements of 265.90(d)?	_____	_____	_____	_____
14. Does the owner or operator submit reports and maintain records as required in 265.94?	_____	_____	_____	_____

Section G CLOSURE AND POST CLOSURE (Part 65 Subpart G)

YES NO NI Remarks

1. Closure 265.112

a. Is the facility closure plan available for inspection?

✓

b. Does the plan identify:

i. maximum extent unclosed during facility life?

✓

barrel Storage

ii. maximum hazardous waste inventory?

✓

iv. estimated year of closure?

✓

v. schedule of closure activities?

✓

c. Has closure begun?

✓

*2. Post-Closure 265.118

a. Is the post-closure plan available for inspection?

✓

Groundwater & Storage Facilities

b. Does this plan contain:

i. description of groundwater monitoring activities and frequencies?

— — —

ii. description of maintenance activities and frequencies for

— — —

AA. integrity of cap, final cover, or containment structures, where applicable

— — —

BB. facility monitoring equipment

— — —

iii. name, address, and phone number of person or office to contact during post-closure care period?

— — —

c. Has the post-closure period begun?

— — —

d. Is the written post-closure cost estimate available? 265.144

— — —

*Applies only to disposal facilities.

Section I - U. AND MANGEMENT OF CONTAINERS (t 265, Subpart I)

	YES	NO	NI	Remarks
1. Are containers in good condition? 265.171	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>reconditioned &</u>
2. Are containers compatible with waste in them? 265.172	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>Tested</u>
3. Are containers managed to prevent leaks? 265.173	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive). 265.176	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>NOT MUTUALLY</u> <u>reactive</u>
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply). 265.177	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>it it it</u>
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Section J - TANKS (Part 265, Subpart J)

YES NO NI Remarks

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192

✓ Not stored in Tanks
2. Do uncovered tanks have at least 60 cm (2 feet) of free-board, or dikes or other containment structures?
3. Do continuous feed systems have a waste-feed cutoff?
4. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193
5. Are required daily and weekly inspections done? 265.194
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? 265.198
 Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7. Are incompatible wastes stored in separate tanks? 265.199
 (If not, the provisions of 40 CFR 265.17(b) apply.)
8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Section K - SURFACE IMPOUNDMENTS (Part 265, Subpart K)

	YES	NO	NI	Remarks
1. Do surface impoundments have at least 60 cm (2 feet) of freeboard? 265.222	_____	_____	<input checked="" type="checkbox"/>	<u>None</u>
2. Do earthen dikes have protective covers? 265.223	_____	_____	_____	_____
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before? 265.225	_____	_____	_____	_____
4. Is the freeboard level inspected at least daily? 265.226	_____	_____	_____	_____
5. Are the dikes inspected weekly for evidence of leaks or deterioration?	_____	_____	_____	_____
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.229	_____	_____	_____	_____
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.230	_____	_____	_____	_____

Section L - WASTE PILES (40 CFR Part 265, Subpart L)

	YES	NO	NI	Remarks
1. Are waste piles covered or protected from dispersal by wind? 265.251			<input checked="" type="checkbox"/>	<u>None</u>
2. Is each in-coming movement of waste analyzed before being added to the waste pile? 265.252				
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.253? 265.253				
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.) 265.256				
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?				
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.) 265.257				
7. Are piles of incompatible waste protected by barriers or distance from other waste?				

Section M - LAND TREATMENT (Part 265, Subpart M)

	YES	NO	NI	Remarks
1. Is treated hazardous waste capable of biological or chemical degradation? 265.272			<input checked="" type="checkbox"/>	<u>Not used</u>
2. Are run-off and run-on diverted from the facility or collected				
3. Is waste analyzed according to 265.273?				
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? 265.278				
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?				
7. Are records kept regarding application dates and rates, quantities, and locations, of all hazardous waste placed in the facility? 265.279				
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.) 265.281				
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) 265.282				

Section N - LANDFILLS (Part 265, Subpart N)

YES NO NI Remarks

1. General Operating Requirements 265.302
Does the facility provide the following:

a. Diversion of run-on away from active portions of the fill? ✓ NOT USED

b. Collection of run-off from active portions of the fill?

c. Is collected run off treated?

d. Control of wind dispersal of hazardous waste?

2. Surveying and Recordkeeping 265.309
Does the Operating Record Include:

a. A map showing the exact location and dimensions of each cell?

b. The contents of each cell and the location of each hazardous waste type within each cell?

3. Special requirements for ignitable or reactive waste. Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive? (Indicate if waste is ignitable or reactive.) 265.312

4. Special Requirements for Incompatible Wastes. 265.313

Does the owner or operator dispose of incompatible waste in separate cells? (If not, the provisions of 40 CFR 265.17(b) apply.)

Note: If waste is rendered non-reactive or non-ignitable see treatment requirements. If not, the provisions of 40 CFR 265.17(b) apply.

YES NO NI Remarks

5. Special requirements for liquid waste 265.314

a. Are bulk or non-containerized liquids placed in the landfill? If "yes," complete items i, ii, and iii.

i. Does the landfill have a chemically and physically resistant liner system?

ii. Does the landfill have a functional leachate collection system?

iii. Are free liquids stabilized prior to or immediately after placement in the landfill?

b. Have containers holding free liquids been placed in landfill since March 22, 1982?

6. Special requirements for Containers 265.315
Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

Section O/P - INCINERATION AND THERMAL TREATMENT (40 CFR Part 265, Subparts O and P)

1. Determination of Steady State

I=incinerator T=thermal

a. Type of unit (i.e., type of incinerator or thermal treatment): _____

b. Components and steady state condition: I 265.343 T 265.373

Was each component at steady state prior to adding waste?

Component	YES	NO	NI	Remarks
_____	_____	_____	<input checked="" type="checkbox"/>	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

2. Waste Analysis

I 265.345

T 265.375

a. Minimum requirements, for wastes not previously burned/treated.

i. Required analyses; has an analysis been performed for the following?

Heating value

Halogen content

Sulfur content

ii. Has documented or written data been substituted for analysis of either:

Lead?

Mercury:

- b. List other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)

	YES	NO	NI	Remarks
3. <u>Monitoring and Inspections</u> I 265.347 T 265.37				
a. Are combustion/emission control instruments monitored at least every 15 minutes?	_____	_____	_____	_____
b. Is steady state maintained or corrections attempted?	_____	_____	_____	_____
c. Is stack plume observed at least hourly for normal color and opacity?	_____	_____	_____	_____
d. Did any stack observations made by owner or operator show a plume different than normal?**	_____	_____	_____	_____
e. If "yes" to (d) above, were corrections made to return emissions to normal appearance?**	_____	_____	_____	_____
f. Are the complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?	_____	_____	_____	_____

**Specify in Remarks for what period of time this was checked.

g. Are emergency shutdown controls and system alarms checked daily for proper operation?	_____	_____	_____	_____
--	-------	-------	-------	-------

4. Open Burning T 265.382 (open burning does not apply to incineration)

a. Only complete this part if the facility open burns hazardous waste.				
i. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned).	_____	_____	_____	_____

YES NO NI Remarks

ii. It this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,0001 to 30,000.....	690 m	2,260 ft

Section Q - CHEMICAL, PHYSICAL AND BIOLOGICAL TREATMENT (Part 265, Subpart Q)

	YES	NO	NI	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure? 265.401	___	___	___	✓ <u>No Treatment</u>
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system)?	___	___	___	_____
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	___	_____
4. Are inspection procedures followed according to 265.403?	___	___	___	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes? 265.405	___	___	___	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.) 265.406	___	___	___	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristics under 40 CFR §261.22, or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

Section A: Scope

1. Complete this Appendix if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	YES	NO	NI	Remarks
(1) Does the operator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>10</u>				
(3) Do the manifest forms examined contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements). 262.21				
a. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Name, mailing address, telephone number, and EPA ID number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
d. Name, address, and EPA ID Number Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
g. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
h. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has <u>NOT</u> received a signed copy from the designated facility within 35 days of the date of shipment. <u>None</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>None</u>				

Section C: PRE-TRANSPORT REQUIREMENTS (Part 262, Subpart C)

	YES	NO	NI	Remarks
1. Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<input checked="" type="checkbox"/>			
2. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required for movement of hazardous waste off-site) 262.31 262.32	<input checked="" type="checkbox"/>			
3. If required, are placards available to transporters of hazardous waste? 262.33	<input checked="" type="checkbox"/>			
4. On-site accumulation of generated hazardous wastes. A HWMF may accumulate hazardous waste it generates either (A) in its storage facility [265.1(b)] or (B) in accordance with 40 CFR 262.34 [see 265.1(c)(7)]. Option B restricts all accumulation to tanks and containers. If the installation elects option A, check this box <input type="checkbox"/> and skip to Section D. If the installation elects option B, complete the following observations: See 40 CFR 262.34 January 11, 1982 Revision				
a. Is each container clearly marked with the start of accumulation date?	<input checked="" type="checkbox"/>			Labels faded and Not legible.
b. Have more than 90 days elapsed since the date inspected in (a)?	<input checked="" type="checkbox"/>			Co. has interim status as a storage facility.
c. Do wastes remain in accumulation tanks for more than 90 days?	<input checked="" type="checkbox"/>			barrels
d. Is each container and tank labeled or marked clearly with the words "Hazardous Waste"?	<input checked="" type="checkbox"/>			

Section D: - RECORDKEEPING AND REPORTING (Part 262, Subpart D)

	YES	NO	NI	Remarks
1. Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40	<input checked="" type="checkbox"/>			

Section E: - INTERNATIONAL SHIPMENTS (Part 262, Subpart E)

1. Has the installation imported or exported Hazardous Waste? 262.50	<input checked="" type="checkbox"/>			
--	-------------------------------------	--	--	--

(If answered Yes, complete the following as applicable.)

- a. Exporting Hazardous waste; has a generator:

	YES	NO	NI	Remarks
i. Notified the Administrator in writing?	_____	_____	_____	_____
ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	_____
iii. Met the Manifest requirements?	_____	_____	_____	_____
b. Importing Hazardous Waste; has the generator met the manifest requirements?	_____	_____	_____	_____

Appendix TR

Section A: SCOPE:

1. Complete this Appendix if the owner or operator transports hazardous waste subject to 40 CFR 263.10.
2. Does the transporter transport hazardous waste into the U.S. from abroad?
3. Does the transporter transport hazardous waste out from the U.S.?
4. Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?

YES NO NI Remarks

✓ Does NOT Transport.

Section B: MANIFEST SYSTEM AND RECORDKEEPING (Part 263, Subpart B)

1. Are copies of completed manifests available for review and retained for three years. 263.22
2. Estimate the number of manifests for shipments completed during the past 6 months.
3. Examine a representative number of manifests. Indicate number examined.
4. Did transporter properly sign and date the manifests examined?
5. Do any manifests indicate shipments delivered to other than the designated facility? 263.21

If (5) is "no," skip 6 and 7.

6. Do any manifests indicate shipments delivered to other than an alternate facility?
7. Are shipments delivered to alternate facilities only because emergency prevents delivery to the designated facility?

✓ Not a Transporter

AUG 5 1981

Nicholas L. Tartaglione, Plant Manager
CIBA-GEIGY Corp., Ren Plastics
P.O. Box 23037
Lansing, Michigan 48909

Re: CIBA-GEIGY
V-W-81-R-67
Consent Agreement and
Final Order

Dear Mr. Tartaglione:

This is to acknowledge receipt of the Consent Agreement and Final Order signed by you. A fully executed copy of the Consent Agreement and Final Order is enclosed for your files.

Your cooperation in resolving this matter is appreciated.

Very truly yours,

Jane E. Schulteis
Chief, Litigation Unit II

Enclosure

cc: Thomas Work w/enclosure
Delbert Rector w/enclosure
Stewart Freeman w/enclosure

bcc: Leder, w/enclosure
Donaldson/Biros, w/enclosure
Joe Boyle, State Implementation Officer, w/enclosure
Regional Hearing Clerk, w/enclosure
Mutan, W/enclosure
Bloom, w/enclosure

JESCHULTEIS:ddw:6-6733:8/4/81



5656 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909
Telephone 517 393-1500

a CIBA-GEIGY Company

June 9, 1981

Certified Mail
Return Receipt Requested

U.S., EPA
Region V
Enforcement Division
Water & Hazardous Materials Enforcement Branch
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Compliance Section

Dear Ms. Gardebring:

Enclosed are three signed copies of the revised
Consent Agreement and Final Order.

Please return two copies after they have been signed
by you.

Very truly yours

A handwritten signature in dark ink, appearing to read "Nicholas L. Tartaglione". The signature is fluid and cursive, with a large loop at the end.

Nicholas L. Tartaglione
Plant Manager

NLT/no
Enc.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:)
) DOCKET NO. V-W-81-R-67
CIBA-GEIGY CORPORATION)
REN PLASTICS)
EAST LANSING, MICHIGAN) CONSENT AGREEMENT
) AND
EPA ID NO. MI D0067352989) FINAL ORDER

WHEREAS,

1. This Administrative proceeding was initiated pursuant to Section 3008 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §6901 et seq., (RCRA).

2. This action was instituted by a Complaint and Notice of Opportunity for Hearing by Complaint on March 18, 1981, charging CIBA-GEIGY Corporation, Ren Plastics (Respondent) with violation of Subtitle C of RCRA, Section 3004, 42 U.S.C. §6924 and regulations 40 CFR Parts 265.16(d), 265.17(a), 265.32, 265.51 through 265.53, 265.73(b) and 265.176. Observations were made by officials of the United States Environmental Protection Agency (U.S. EPA) during a December 8, 1980, inspection of the Respondent's facility located at 4917 Dawn Avenue,

AGREEMENT

Based upon the above stipulation, Respondent agrees to:

1. Follow the schedule prepared to inspect all safety, emergency and operating equipment.
2. Maintain written job titles and descriptions for all employees who work with hazardous waste.
3. Document and maintain records of all training each employee receives.
4. Maintain the posted "No Smoking" signs at all locations where ignitable or reactive wastes are stored and handled.
5. Maintain in place a telephone at the hazardous waste storage area.
6. Maintain records of all hazardous waste movements, amounts and storage methods.
7. Store all ignitable or reactive waste at a distance of 50 feet or greater from the property line.
8. Maintain and update as needed the facility Contingency Plan and include the "REFER PLAN" as an addendum.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

CIBA-GEIGY CORPORATION
REN PLASTICS
EAST LANSING, MICHIGAN

EPA ID NO. MI D0067352989

)
) DOCKET NO. V-W-81-R-67
)
)
) CONSENT AGREEMENT
) AND
) FINAL ORDER

WHEREAS,

1. This Administrative proceeding was initiated pursuant to Section 3008 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §6901 et seq., (RCRA).

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3. The U.S. EPA is in receipt of a letter dated April 21, 1981, from Nicholas C. Tartaglione, Plant Manager. The letter represents that the Respondent has complied with all requirements of the Complaint.

WHEREFORE, for the purpose of this proceeding only and without prejudice to any other proceeding, the following stipulations are agreed to:

STIPULATIONS

AGREEMENT

Based upon the above stipulation, Respondent agrees to:

1. Follow the schedule prepared to inspect all safety, emergency and operating equipment.
2. Maintain written job titles and descriptions for all employees who work with hazardous waste.
3. Document and maintain records of all training each employee receives.
4. Maintain the posted "No Smoking" signs at all locations where ignitable or reactive wastes are stored and handled.
5. Maintain in place a telephone at the hazardous waste storage area.
6. Maintain records of all hazardous waste movements, amounts and storage methods.
7. Store all ignitable or reactive waste at a distance of 50 feet or greater from the property line.
8. Maintain and update as needed the facility Contingency Plan and include the "REFER PLAN" as an addendum.

The above Stipulation and Agreement are consented to by:

Nicholas D. V. Longtime
CIBA-GEIGY Corporation, Ren Plastics

Dated: June 9, 1981

Sandra S. Gardebring
Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental Protection Agency
Region V

Dated: 6-17-81

MAY 2 8 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nicholas L. Tartaglione
Plant Manager
CIBA-GEIGY Corporation
Ren Plastics
Post Office Box 23037
Lansing, Michigan 48909

Re: CIBA-GEIGY Corporation
Ren Plastics
East Lansing, Michigan
Docket No. V-W-81-R-67
EPA ID No. MI D0067352989

Dear Mr. Tartaglione:

Enclosed is a Consent Agreement and Final Order regarding the above-referenced facility. The Order is to be reviewed by yourself and signed. Please return the signed original to the United States Environmental Protection Agency (U.S. EPA), Region V, Enforcement Division, Water & Hazardous Materials Enforcement Branch, Attention: Compliance Section, 230 South Dearborn Street, Chicago, Illinois 60604. It is requested that the signed Order be returned within two weeks from your receipt of this letter. Upon our receipt of a signed copy, a fully executed copy will be returned for your file.

The U.S. EPA has a recommendation with regard to the contingency plan you submitted to us. The REFER Plan mentioned in Adendum VI which relates to fire fighting activities, should be made a permanent part of the contingency plan. That recommendation appears in paragraph eight of the enclosed agreement.

If you have any questions on this matter, please call either Michael Mutnan, an engineer on my staff at (312) 353-2110, or Eileen Bloom, an attorney on my staff at (312) 353-2094.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: Thomas Work, Chief
Resource Recovery Division
Michigan Department of Natural Resources

Stewart Freeman
Michigan Attorney General's Office

bcc: Region V, Compliance Section, Donaldson/Doug Farnsworth, Acting Chief
Regulatory Branch, EN-335

Leder
Bloom
Wysocki

MJM 5/13/81
MUTNAN:srj 6-6770 5-1-81

MUNO *MJM acting 5/13/81*
Bmr 5/13/81
MINER *WTHM 5/14/81*

BLOOM *EAB 5/15*
GRMES RMB 5/15
GROMNICKI *OC 5/18*

FENNER *am 5/21*

BRYSON *2/13*

GARDEBRING

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

CIBA-GEIGY CORPORATION
REN PLASTICS
EAST LANSING, MICHIGAN

) DOCKET NO. V-W-81-R-67

) CONSENT AGREEMENT

) AND

) FINAL ORDER

EPA ID NO. MI D0067352989

WHEREAS,

1. This Administrative proceeding was initiated pursuant to Section 3008 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §6901 et seq., (RCRA).

2. This action was instituted by a Complaint and Notice of Opportunity for Hearing by Complaint on March 18, 1981, charging CIBA-GEIGY Corporation, Ren Plastics (Respondent) with violation of Subtitle C of RCRA, Section 3004, 42 U.S.C. §6924 and regulations 40 CFR Parts 264.15(b), 265.16(d), 265.17(a) 265.32, 265.51 through 265.53, 265.73(b) and 265.176. The violations were observed by officials of the United States Environmental Protection Agency (U.S. EPA) during a December 8, 1980, inspection of the Respondent's facility located at 4917 Dawn Avenue, East Lansing, Michigan.

3. The U.S. EPA is in receipt of a letter dated April 21, 1981, from Nicholas C. Tartaglione, Plant Manager. The letter represents that the Respondent has complied with all requirements of the Complaint.

WHEREFORE, for the purpose of this proceeding only and without prejudice to any other proceeding, the following stipulations are agreed to:

STIPULATIONS

1. Respondent hereby admits the jurisdictional allegations contained in the Complaint.
2. Respondent admits the remaining the allegations set forth in the Complaint.
3. Respondent explicitly waives its right to request a hearing on the allegations in the Complaint.
4. Respondent has complied with all requirements of the Complaint.

AGREEMENT

Based upon the above stipulation, Respondent agrees to:

1. Follow the schedule prepared to inspect all safety, emergency and operating equipment.
2. Maintain written job titles and descriptions for all employees who work with hazardous waste.
3. Document and maintain records of all training each employee receives.
4. Maintain the posted "No Smoking" signs at all locations where ignitable or reactor wastes are stored and handled.
5. Maintain in place a telephone at the hazardous waste storage area.
6. Maintain records of all hazardous waste movements, amounts and storage methods.
7. Store all ignitable or reactive waste at a distance of 50 feet or greater from the property line.
8. Maintain and update as needed the facility Contingency Plan and include the "REFER PLAN" as an addendum.

The above Stipulation and Agreement are Consented to by:

CIBA-GEIGY Corporation, Ren Plastics

Dated: _____

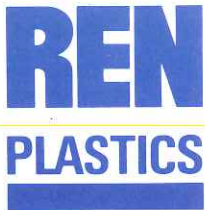
Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental protection Agency
Region V

Dated: _____

It being so consented, it is so ordered. This Stipulation and Agreement shall become effective immediately.

Valdas V. Adamkus
Acting Regional Administrator
U.S. Environmental Protection Agency
Region V

Dated: _____



5656 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909
Telephone 517 393-1500

a CIBA-GEIGY Company

May 4, 1981

Mr. Michael Mutnan
Enforcement Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Mutnan:

Per our discussion of April 30, 1981, I have enclosed a copy of the pollution Incident Prevention Plan as amended to include the waste storage area.

If you have any questions concerning it, please feel free to call me.

Very truly yours,

REN PLASTICS Div.
Ciba-Geigy Corporation

A handwritten signature in black ink that reads "Michael L. Munsell". The signature is written in a cursive style with a large, stylized "M" and "L".

Michael L. Munsell
Industrial Health/Safety Coordinator

MM/mp
4/B-24



5656 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909
Telephone 517 393-1500

a CIBA-GEIGY Company

May 4, 1981

Mr. Michael Mutnan
Enforcement Division
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Mutnan:

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A handwritten signature in black ink that reads "Michael L. Munsell". The signature is written in a cursive style with a large, stylized "M" and "L".

Michael L. Munsell
Industrial Health/Safety Coordinator

MM/mp
4/B-24

Pollution Incident Prevention Plan

I Underground Tank Farm

A. Description and Location

Ren's underground tank farm consists of eleven steel tanks. Their contents and sizes are as follows:

<u>Contents</u>	<u>Size</u>
Propylene Oxide	(1) 1000 gallon
	(1) 2000 gallon
Toluene	(1) 4000 gallon
Ethanol	(1) 4000 gallon
Triethylene tetraamine	(2) 4000 gallon
Diethylene triamine	(2) 1000 gallon
Polybutadiene polyol	(1) 8000 gallon
No. 1 Fuel oil	(1) 4000 gallon
Empty (Acrylonitrile Proposed)	(1) 2000 gallon

The nearest tank is about 350 feet from the Red Cedar River.

B. Maintenance

One procedure is done on a yearly basis to check on the integrity of the tanks. The amount of material in each tank is measured just prior to Ren's Christmas break and then they are measured again the first day back at work after the first of January. The two measurements are compared to see if there is any change. If there is a change of more than 1/8 inch in the depth of the material in the tank, the tank will be drained into suitable containers and a physical in-tank inspection made.

C. Spill Prevention

Materials stored in the underground tanks are replenished from tank trucks. The material is ordered on the basis of usage and is initiated when the inventory drops below a previously determined level. This level is based on tanker and tank capacities. In addition, there are level readout devices (Level-O-Meters) on each tank that are checked during the tank filling operation to ensure that the tank is not over-filled. In addition, the fill tubes for the tanks each have a quick coupling for a positive connection between tanker and tank.

D. Spill Control and Containment Provisions

The area behind the plant to the property line is paved (See plot plan for details). There is also a curbed area around the fill tubes to contain any spill that may occur. For spill cleanup, Hazorb (see attached brochure) is stationed in the near vicinity. Surface drains in the area are sealed off during tank filling operations.

II Outside Drum Storage

A. Description and Location

There are between 100-600 55 gallon drums stored in the previously mentioned paved area. The majority of them are stored, 4 drums per pallet, 3 pallets per stack. The drums nearest the river are about 225 feet from it.

The materials that are most commonly stored in this area are:

- 75/25 Epoxy Resin/Xylenes blend
- Waste toluene
- Waste ethanol
- Acetone
- Dimethylamino propylamine
- A solvent containing formulation that has Ethanol, Toluene and Xylenes in it
- Methyl Ethyl Ketone
- Acrylonitrile (Drum storage of this material will cease if AQD allows us to continue to use it. It will then be stored in the previously noted underground tank.

B. Maintenance and Inspection

The drums are inspected on a daily basis for leakage.

C. Spill Control and Containment Provisions

Hazorb is located in the near vicinity for spill cleanup. The entire drum storage area (20 feet by 80 feet) is an average of 3 inches below grade for containment. There are provisions for blocking the surface drains in case of a spill.

III In-House Tank Storage

A. Description

There are seven tanks located in-house. There are six 4000 gallon tanks and one 6000 gallon tank. Two of the 4000 gallon tanks are vertical, the rest are horizontal and located overhead. The contents of these tanks are epoxy resins and diluted epoxy resins. None of the materials stored in them are on the Critical Materials Register.

B. Maintenance and Inspection

The relative openness of these tanks makes visual inspection an almost continual process. Any leaks would be visible in well traveled aiseways or work areas.

C. Spill Containment and Control Provisions

The only floor drain in the vicinity has a one foot tall standpipe on it to prevent any material on the floor from going down it. This drain is connected to the sanitary sewer, as all drains within the building are. Each tank's vent has an over-flow alarm and is connected to a common line that empties into a receiver. When material is pumped into the tanks, the position of the valves is checked by 2 individuals to ensure that it is going into the correct tank.

IV In-House Drum Storage

A. Description and Location

For the most part drums are stored on pallets and the pallets of drums stacked a maximum of four high. There are two warehousing areas that contain the majority of the drums. One area, is the south end of the building, the other is on the west side.

B. Maintenance and Inspection

The constant work being done in the area allows for continual inspection for leaks and spills. Additionally, with the use of Department of Transportation approved drums, a leak or spill is unlikely to occur except in case of upset.

C. Spill Control and Containment Provisions

In the warehouses, the floor drains are connected with Meridian Township sanitary sewers. They are fitted with flush-fitting plugs which would only be removed to drain water from the floor. This was a requirement for building permit approval.

V Security Provisions

A. Outside Storage - Drums and Underground Tanks

The area in which these are located is fenced at the property line with a six foot cyclone fence. Lighting is provided in the area as well.

B. Inside Storage - Drums and Tanks

The building security is provided by Sonitrol. It consists of door monitors and sound monitors. In case of unauthorized entry, the police are notified.

VI Responsibilities

The following persons are responsible for spill prevention and cleanup:

- N.L. Tartaglione - Responsible for overseeing entire program.
- M.L. Munsell - Responsible for administration of program and coordination of preventive measures and spill cleanup.
- A.N. Cianciarulo - Back-up to M.L. Munsell
- R. St. John - Responsible for implementing technical preventative measures and back-up for spill clean-up.
- D.P. Schuitema - Responsible for implementing administrative preventive measures.
- R. Parker,
R. Schram,
A. Sampson,
L. Keller - Responsible for supervising the workers to ensure that preventive measures are utilized and cleanup procedures followed.
- R. Parker,
A. Sampson - Responsible to ensure that daily inspections of storage areas are made.

VII Emergency Phone Numbers

- A. The following phone numbers are for spills that occur outside of normal working hours and that are contained with no danger of the spill entering surface or floor drains.

The following are to be contacted immediately in the sequence of listing:

M.L. Munsell	349-5830
N.L. Tartaglione	349-0747
D.P. Schuitema	374-7624
Corporate Safety, Health & Ecology, R. Curran	1-800-431-1874

If none of the above can be reached the following are designated alternates.

R. St. John	543-5199
A.N. Cianciarulo	323-3640
R. Parker	676-9436
R. Schram	339-2436
A. Sampson	332-3868

- B. The following agencies should be contacted if there is a possibility that a spill may enter the sewer system, river, or ground.

Department of Natural Resources
Pollution Emergency Alert System

1-800-292-4706

Environmental Protection Agency
(only for those materials and quantities on the
attached list)

1-800-424-8802

Meridian Township ^{Water} ~~Waste~~ Treatment Plant

337-7535

Meridian Township

337-6527

Meridian Township Police and/or Fire, Paramedics
(In case of suspected vandalism, fire, or personal
injury).

332-6526

- C. The following list of numbers is for licensed industrial waste haulers to dispose of materials from cleanup of a spill and contractors to assist in the cleanup if needed.

Waste Hauler

Chem-Met Services, Inc.
18550 Allen Road
Wyandotte, Michigan 48192

313-282-9250 (Business)
313-885-8080 (Home)

Incinerator

Liquid Disposal, Inc.
3901 Hamlin Road
Utica, Michigan 48087

313-739-2727

Contractor

K&D Industrial Services, Inc.
6470 Beverly Plaza
Romulus, Michigan 48174

313-729-3350 (Business)
313-464-2208 (Home)

- D. This plan will be reviewed annually. It will be revised and updated as necessary to maintain the plan's functionality.

List of Reportable Materials

List of reportable materials* and quantities that require reporting to the EPA if they have or could contaminate a waterway.

<u>Material</u>	<u>Quantity (Pounds)</u>
Acrylonitrile	100
n-Butyl phthalate	100
Methyl Methacrylate	5000
Propylene Oxide	5000
Toluene	1000
Xylene	1000

*These are the only materials currently in use in sufficient quantity for a reportable spill to occur.

Pollution Incident Prevention Plan

Addendum I

Floor Drains in the Mixing and Kettle Rooms

A. Description

1. Mixing Room

There are two floor drains in this room. One is a 10 x 1/2 foot trench, the other is a 22 inch diameter manhole. They have both been sealed except for six inches of the trench drain, the opening on this is six inches above floor level. Please see plot plan for locations.

2. Kettle Room

There are two floor drains in this room. They are both trench drains. They are 6 x 1/2 foot and 8 x 1/2 foot in size. They have been sealed except for elevated openings to receive cooling water. Please see plot plan for locations.

All drains are connected to the sanitary sewer.

Pollution Incident Prevention Plan

Addendum II

Trench Drain and Drain in Pipe Trench

I. Trench Drain

A. Description

The dimensions of this drain are 8 feet long by 1 foot wide. It is connected to the storm sewer by a two inch line. The drain is located next to the overhead door from the south warehouse into the tank farm. It is provided to prevent water from entering the warehouse.

B. Control Measures

This drain is normally open. In case of a spill, an expandable plug is provided to close the drain during clean-up.

II. Pipe Trench Drain

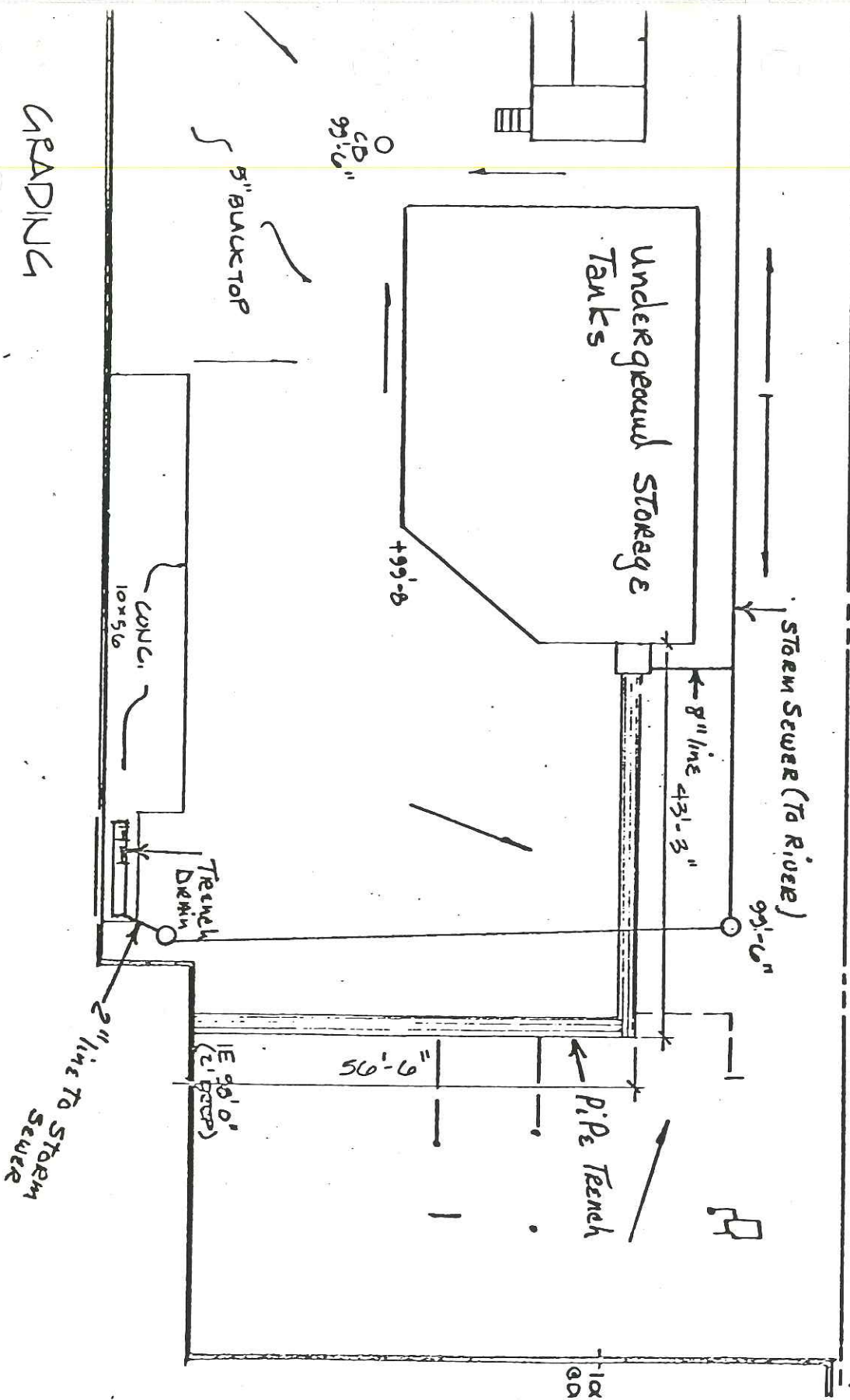
A. Description

The pipe trench was built to contain pipe lines from the underground storage tanks into the building. The trench has an eight inch drain connected to the storm sewer. It is reduced to six inches at the trench with a butterfly valve for control.

B. Control Measures

The butterfly valve is normally closed. It is opened to drain the trench of water and then closed prior to pumping from any of the underground storage tanks. After the pumping is completed, the trench is inspected again to ensure that there is no material accumulation in the trench. The pipes are inspected on an annual basis for integrity.

GRADING



Pollution Incident Prevention Plan

Addendum III

Surface Drains in Vicinity of Outside Drum Storage Area.

There are two surface drains in the vicinity of the drum storage area. These will be converted to manually controlled drains that will be closed except to drain water from the area. Prior to opening the drains, a visual inspection of all drums on the pad will be made to check for leakage. If a leaking drum is detected, the water will not be released until it is determined that the organics content of the accumulated water is at an acceptable level. If it is higher than acceptable, the water will be put into drums to be disposed of by incineration.

Pollution Incident Prevention Plan

Addendum IV

Underground Storage Tanks

As described in Section I, there are a total of eleven underground storage tanks. Seven are contained in an area with drainage tile around them. The tile is connected to the storm sewer which runs to the Red Cedar river. To monitor these tanks the following steps will be undertaken in addition to the previously described activities.

1. All of the tanks will be pressure tested for integrity. On the propylene oxide storage tanks, the N₂ feed will be cut and a determination of pressure loss will be made. On the other 9 tanks, pressure testing will be done by a contractor.
2. The effluent from the storm sewer will be monitored for its TOC content three times a week. If there is a sudden gross increase in the TOC content, analysis for the responsible material will be made to determine if it is a material stored in the tanks. If the contaminant can be traced to one of our tanks, a corrective program that includes draining of the tank, inspection and replacement if necessary. The DNR will be notified of the result.

Pollution Incident Prevention Plan

Addendum V

(This Addendum supersedes and replaces Addendum IV in its entirety.)

As described in Section I, there are a total of eleven underground storage tanks. Seven are contained in an area with drainage tile around them. The tile is connected to the storm sewer which runs to the Red Cedar river. To monitor these tanks the following steps will be undertaken in addition to the previously described activities.

1. On the propylene oxide storage tanks, the N₂-feed will be cut and a determination of pressure loss will be made.
2. On all other tanks an inventory control will be used. A record of all transactions for each tank will be maintained. Every two weeks a physical inventory of each tanks' contents will be taken and a reconciliation between transactions and actual inventory will be made. All incoming tankers will be weighed and tared to determine the actual amount delivered.
3. The effluent from the storm sewer will be monitored for its TOC content three times a week. If there is a sudden gross increase in the TOC content, analysis for the responsible material will be made to determine if it is a material stored in the tanks. If the contaminant can be traced to one of our tanks, a corrective program that includes draining of the tank, inspection and replacement if necessary. The DNR will be notified of the result.

POLLUTION INCIDENT PREVENTION PLAN

ADDENDUM VI

Contingency planning for hazardous waste as required by the Federal Resource Conservation and Recovery Act, this addendum specifies courses of action to be followed in case of emergency involving hazardous waste.

Contingency 1 - Accidental spill of hazardous waste by rupture or puncture of containers.

Actions to be followed: Turn off or remove sources of ignition (lift trucks, gasoline powered vehicles). Initiate clean-up by scattering hazorb pillows on spill. Contact emergency coordinator..

Contingency 2 - Accidental spill with resultant fire.

Actions to be followed: Call Meridian Township Fire Department and report the fire. Call the Emergency Coordinator. Begin fighting fire according to REFER Plan.

Meridian Township Fire Department - 332-6526

Emergency Coordinator -

Mike Munsell Ext. 303 home 332-5217

Alt. Nick Tartaglione Ext. 317 home 349-0747

Alt. R. Schram Ext. 311 home 339-2436

Emergency equipment for waste storage area.

Qty.	Description	Location
1	100 foot 1-1/2" fire hose	Just inside pedestrian
1	10 lb. ABC Extinguisher	door southwest corner
1	Pallet Hazorb spill control pillows	of warehouse
1	Telephone	southwest corner of warehouse

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form 1 - General Facility Standards

I. General Information:

(A) Facility Name: CIBA-GEIGY CORPORATION KEN PLASTICS
(B) Street: 4917 Dawn Avenue [mailing address: PO Box 23037 Lansing, MI 48909]
(C) City: East Lansing (D) State: MICHIGAN (E) Zip Code: 48823
(F) Phone: (517) 393-1500 (G) County: INGHAM

(H) Operator: CIBA-GEIGY CORP.
(I) Street: 444 Sawmill River Rd
(J) City: Andover (K) State: NY (L) Zip Code: 10502
(M) Phone: (914) 478-3131 (N) County: _____

(O) Owner: SAME AS OPERATOR
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____

_____ Federal _____ Municipal X Private
(V) Type of Ownership: _____ State _____ County

(W) Date of Inspection: 12/8/80 (Q) Time of Inspection (From) 4:00pm (To) 6:00pm

(X) Weather Conditions: drizzle, 45°F

(Y) Person(s) Interviewed	Title	Telephone
<u>MICHAEL MUNZELL</u>	<u>Industrial Safety and Health</u>	<u>(517) 393-1500</u>
<u>Nick Tartaglione</u>	<u>Plant Mgr. ^{Coord}</u>	<u>(517) 393-1500</u>
(Z) Inspection Participants	Title	Telephone
<u>Dennis Armbruster</u>	<u>Dist. Eng. MDNR</u>	<u>517 322-1339</u>
<u>Joseph Boyle</u>	<u>Biologist, ^{Air Quality Div} USEPA</u>	<u>(312) 353-2197</u>
<u>Ev. Mortenson</u>	<u>Chem. Eng. USEPA</u>	<u>(312) 886-6221</u>

II. Description of Site Activity

- (A) ☒ Generator [(Form 2) *attached*]
- (B) ☒ Transporter [(Form 3) *not included*]
- (C) ☐ Chemical, Physical and Biological Treatment (Form 4)
- (D) ☒ Storage [(Form 5) *attached*]
- (E) ☐ Landfill (Form 6)
- (F) ☐ Incineration (Form 7)
- (G) ☐ Land Treatment (Form 4)
- (H) ☐ Thermal Treatment (Form 7)
- (I) Comments: no hazardous waste is received from off-site sources.
Attached is FORM 8700-12, and Part A permit application, and
11/14/80 letter notifying USEPA of transporting activity

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

	Yes	No	Not Inspected	See Remark Number
(J) Has this facility Submitted a Part A Permit Application?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

III GENERAL FACILITY STANDARDS

	Yes	No	Not Inspected	See Remark Number
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u> </u>	<u> </u>	<u> X </u>	<u>N/A no off-site source</u>
2. Transfer of Ownership?	<u> </u>	<u> X </u>	<u> </u>	<u>no transfer</u>
(B) General Waste Analysis:				
1. Has the owner ^{or} operator obtained a detailed chemical and physical analysis of the waste?	<u> X </u>	<u> </u>	<u> </u>	<u>"Waste solvent drum log" gives name of solvent and what it was used to clean.</u>
2. Does the owner ^{or} operator have a detailed waste analysis plan on file at the facility?	<u> X </u>	<u> </u>	<u> </u>	<u>in procedures for Handling Waste Solvents"</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u> </u>	<u> </u>	<u> X </u>	<u>N/A no off-site sources</u>
(C) Security - Do security measures include:				
1. 24-Hour Surveillance?	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
2. Artificial or Natural Barrier Around Facility?	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
3. Controlled Entry?	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
4. Danger Sign(s) at Entrance?	<u> </u>	<u> X </u>	<u> </u>	<u>sign is on order</u>
(D) Do Owner ^{or} Operator Inspections Include:				
1. Records of Malfunctions?	<u> </u>	<u> </u>	<u> X </u>	<u>log not available</u>
2. Records of Operator Error?	<u> </u>	<u> </u>	<u> X </u>	<u>log not available</u>
3. Records of Discharges?	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
4. Inspection Schedule?	<u> X </u>	<u> </u>	<u> </u>	<u> </u>
5. Safety, Emergency Equipment?	<u> </u>	<u> X </u>	<u> </u>	<u> </u>
6. Security Devices?	<u> X </u>	<u> </u>	<u> X </u>	<u> </u>
7. Operating and Structural Devices?	<u> X </u>	<u> </u>	<u> </u>	<u>ADT contract</u>
8. Inspection Log?	<u> </u>	<u> X </u>	<u> </u>	<u> </u>

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	Not Inspected	See Remark Number
(E) Do Personnel Training Records Include:				
1. Job Titles?	_____	<u>X</u>	_____	<i>no documents available.</i>
2. Description of Training?	_____	<u>X</u>	_____	<i>however, personnel have been verbally instructed in use of waste solvents & drum hog.</i>
3. Records of Training?	_____	<u>X</u>	_____	
Is Personnel Training Completed within the Required Time Frame?	_____	_____	<u>X</u>	<u>N/A till 5/81</u>
(F) Are the Following Special Requirements for Ignitable, Reactive, or Incompatible Wastes Addressed?				
1. Special Handling?	<u>X</u>	_____	_____	
2. No Smoking Signs?	_____	<u>X</u>	_____	
3. Separation and Confinement?	<u>X</u>	_____	<u>X</u>	<i>any mixing would result in non-reactive polymerization of solvents</i>
		<i>reactive aluminum powder is separated in containers from solvents.</i>		

IV. PREPAREDNESS AND PREVENTION

Roto-Clone = Scrubber waste.

(A) Maintenance and Operation of Facility:

1. Is there any evidence of fire, explosion, or release of from containers hazardous waste or hazardous waste constituent?

X

overflow from 55 gal container of "Roto-Clone" drum reacting in parking lot generating heat vapor controlled by Hazorb before reaching street.

(B) Does the Facility have the Following Equipment:

1. Alarm System?
2. Telephone or 2-Way Radios?
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

X

Hazorb

Indicate the volume of water and/or foam available for fire control:

Units: 12" main to municipal water supply. 1780 g.p.m.

	Yes	No	Not Inspected	See Remark Number
) Testing and Maintenance of Emergency Equipment:				
1. Has the Owner or Operator established Testing and Maintenance Procedures for Emergency Equipment?	X			
2. Is Emergency Equipment Maintained in Operable Conditions?	X			
(D) Has Owner ^{or} Operator Provided Immediate Access to Internal Alarms (if needed)?	X			
(E) Is there Adequate Aisle Space for Unobstructed Movement?	X			
(F) Are Arrangements with Local Authorities Included in the Operating Record?		X		verbal arrangement with Meridian Township Fire Dept.

V . CONTINGENCY PLAN AND EMERGENCY PROCEDURES

(A) Does the Contingency Plan Contain the Following Information:

1. The actions facility personnel must take to comply with §264.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part.)

2. Arrangements agreed to by Local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §264.37?

X

X

An MDNR required "Pollution Incident Prevention Plan" was available. It does address spill, but not all of 256.56 procedures

	Yes	No	Not Inspected	See Remark Number
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.)	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
(B) Are copies of Contingency Plan Available at Site and local Emergency Organizations?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
2. Is Coordinator Familiar with all aspects of site operation and emergency procedures?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>
(D) Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency procedures listed in 256.56?	<u> </u>	<u><i>OK</i></u>	<u>X</u>	<u><i>no emergency has occurred</i></u>

VI . MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

	Yes	No	Not Inspected	See Remark Number
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?	<u> </u>	<u> </u>	<u>X</u> N/A JB	<u>no off-site sources</u>
2. Are records of past shipments retained for 3 years?	<u> </u>	<u> </u>	<u>X</u>	<u>1/</u>
(B) Does the owner or operator meet requirements regarding Manifest Discrepancies?	<u> </u>	<u> </u>	<u>X</u>	<u>1/</u>
(C) Operating Record				
Does the facility maintain an operating record at the site as required in §265.73?	<u> </u>	<u>X</u>	<u>X</u> N/A JB	<u> </u>
(D) Availability, Retention and Disposition of Records				
Are all records available at the site for inspection as required in §265.74?	<u>X</u>	<u> </u>	<u> </u>	<u> </u>

VII . CLOSURE AND POST CLOSURE

(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	<u> </u>	<u> </u>	<u>X</u>	<u>N/A</u>
2. Has this plan been submitted to the Regional Administrator?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
3. Has Closure begun?	<u> </u>	<u>X</u>	<u> </u>	<u> </u>
4. Is closure cost estimate available by May 19, 1981?	<u> </u>	<u> </u>	<u>X</u>	<u>N/A</u>
(B) Post Closure Care and Use of Property - Has the Owner ^{or} Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?	<u> </u>	<u> </u>	<u> </u>	<u>N/A</u>

M10067352989
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
Form 2 - Generator Inspection

I. General Information:

- (A) Installation Name: CIBA - GEIGY CORPORATION, REN PLASTICS
- (B) Street: 4917 Dawn Ave
- (C) City: E. Lansing (D) State: MI (E) Zip Code: 48823
- (F) Phone: (517) 393-1500 (G) County: INGHAM
- (H) Operator: _____
- (I) Street: _____
- (J) City: _____ (K) State: _____ (L) Zip Code: _____
- (M) Phone: _____ (N) County: _____
- (O) Owner: _____
- (P) Street: _____
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- (V) Type of Ownership: _____ Federal _____ Municipal X Private
_____ State _____ County
- (W) Date of Inspection: 12/8/80 Time of Inspection (From) 4:00pm (To) 6:00pm
- (X) Weather Conditions: _____

(Y) Person(s) Interviewed

Title

Telephone

Same as Form 1

(Z) Inspection Participants

Title

Telephone

II. OTHER TYPE OF HAZARDOUS WASTE ACTIVITY

Same as FORM 1

(A) _____ Transporter (Form 3)

(B) _____ Chemical, Physical and
Biological Treatment (Form 4)

(C) _____ Storage (Form 5)

(D) _____ Landfill (Form 6)

(E) _____ Incineration (Form 7)

(F) _____ Thermal Treatment (Form 7)

(G) Comments: _____

Supplemental forms (Listed in Parathesis) must be completed for each activity inspected. Attach all Supplemental forms to this report.

III. MANIFEST

	Yes	No	Not Inspected	See Remark Number
(A) Are copies of the Manifest available?	X			
(B) Does the Manifest contain the following information:				
1. Manifest document number?	X JB		X	last shipment 11/18
2. Name, mailing address, telephone number, and EPA ID Number of Generator?			X	
3. Name and EPA ID Number of Transporter(s)?			X	
4. Name, Address, and EPA ID Number of Designated permitted facility and alternate facility?			X	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?			X	
6. The total quantity of waste(s) and the type and number of containers loaded?			X	
7. Required Certification?			X	
8. Required Signatures?			X	
(C) Does the Owner or Operator Submit Exception Reports when Needed?			X	N/A

IV. PRE-TRANSPORT REQUIREMENTS

(A) Is Generator Packaging waste in accordance with DOT Regulations?	X JB		X	last shipment 11/18
(B) Are waste packages marked and labeled in accordance with DOT Regulations concerning hazardous waste materials?		X JB	X	JB marking absent
If required, are placards available to transporter?			X	no shipment

(D) Pre-shipment Accumulation:

	Yes	No	Not Inspected	See Remark Number
1. Are containers marked with start of accumulation date?	<u> </u>	<u> X </u>	<u> </u>	<i>However, as TSD not required to in 265</i>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	<u> </u>	<u> </u>	<u> X </u>	<i>N/A, facility applied for TSD interim status.</i>
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<u> </u>	<u> X </u>	<u> </u>	<i>ignitable waste within 45'</i>
4. Are wastes stored in tanks managed according to the following:			<i>see attached Part A, Form 3510-3, p. 5 of 5. center line of concrete pad is 45' from property line. Ignitable waste was located west of center line.</i>	
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<u> </u>	<u> </u>	<u> </u>	<i>N/A</i>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	<u> </u>	<u> </u>	<u> </u>	<i>//</i>
c. Do continuous feed systems have a waste-feed cutoff?	<u> </u>	<u> </u>	<u> </u>	<i>//</i>
d. Are required daily and weekly inspections done?	<u> </u>	<u> </u>	<u> </u>	<i>//</i>
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	<u> </u>	<u> </u>	<u> </u>	<i>//</i>
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	<u> </u>	<u> </u>	<u> </u>	<i>//</i>

Yes

No

Not
InspectedSee Remark
Number

5. If hazardous wastes accumulate on site, does the generator follow the following general facility standards?

☒ General Facility Standards

A. Do Personnel training records include:

If Generator is also a TSD; omit section IV

1. Job Titles?

2. Description of Training?

3. Records of Training?

Is Personnel Training Completed within the Required Time Frame?

REAGB.

B. Preparedness and Prevention

1. Maintenance and Operation of Facility:

a. Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

2. Does the Facility have the following equipment?

a. Alarm system?

b. Telephone or 2-Way Radios?

c. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

Indicate the volume of water and/or foam available for fire control

Units:

3. Testing and Maintenance of Emergency Equipment:

a. Has the Owner or Operator established testing and Maintenance Procedures for Emergency Equipment

b. Is emergency equipment Maintained in Operable Condition?

	Yes	No	Not Inspected	See Remark Number
4. Has Owner/Operator Provided Immediate Access to Internal Alarms (if needed)?	_____	_____	_____	_____
5. Is there adequate Aisle Space for unobstructed Movement?	_____	_____	_____	_____
6. Are arrangements with local authorities included in the operating record?	_____	_____	_____	_____
(C) Contingency Plan and Emergency Procedure				
1. Does the contingency plan contain the following:				
a. The actions facility personnel must take to comply with §264.51 and 261.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part)	_____	_____	_____	_____
b. Arrangements agreed to by local police departments, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §264.37?	_____	_____	_____	_____
c. Names, addresses, and Phone numbers (office and Home) of all persons qualified to act as emergency coordinator.	_____	_____	_____	_____
d. A list of all emergency equipment at the facility which include the location and physical description of each item on the list, and a brief outline of its capabilities?	_____	_____	_____	_____
e. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.	_____	_____	_____	_____

	Yes	No	Not Inspected	See Remark Number
2. Are copies of the Contingency Plan available at site and local Emergency Organizations?	_____	_____	_____	_____
3. Emergency Coordinator				
a. Is the Facility Emergency Coordinator Identified?	_____	_____	_____	_____
b. Is Coordinator Familiar with all aspects of site operation and Emergency Procedures?	_____	_____	_____	_____
c. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	_____	_____	_____	_____
4. Emergency Procedures				
If an Emergency Situation has occurred at this facility; has the Emergency Coordinator followed the Emergency Procedures listed in §256.56?	_____	_____	_____	_____

VI. RECORDKEEPING

- (A) Are Manifests, Annual Reports, Exception Reports, and All Test Results and Analyses Retained for at least three years?

_____	_____	_____ X	_____
-------	-------	---------	-------

hazardous no waste shipped after 11/19/80

VII. INTERNATIONAL SHIPMENTS

- (A) Has the Installation Imported or Exported Hazardous Waste?

_____	_____ X	_____	_____
-------	---------	-------	-------

(If A was answered Yes, then complete one or both of the following)

1. Exporting Hazardous waste, has a generator:
- a. Notified the Administrator in writing?
- b. Obtained the Signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

_____	_____	_____	_____
_____	_____	_____	_____

Yes

No

Not
Inspected

See Remark
Number

c. Met the Manifest requirements? _____

2. Importing Hazardous Waste,
has the generator:

a. Met the manifest requirements? _____

VIII. PREPARER INFORMATION

Name: Joseph M. Boyle

Title: Geologist

Phone Number: 312 353-2197

REMARKS: _____

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
SUPPLEMENTAL FORM 5 FOR STORAGE FACILITY INSPECTIONS

I. General Information

(A) Facility Name: CIBA-GEIGY CORPORATION, PEN PLASTICS
(B) Street: 4917 Dawn Ave
(C) City: East Lansing (D) State: Michigan (E) ZIP Code _____
(F) Date of Inspection: 12/18/80

II. Storage Facility Standards (Part 265)

A. Facilities which store containers of hazardous waste (Subpart I)

	YES	NO	NOT IN-SPECTED	REMARK #
1. Are containers in good condition?				
2. Are containers compatible with waste in them?	X			DOT 17-E
3. Are containers stored closed?	X			
4. Are containers managed to prevent leaks?	X			
5. Are containers inspected weekly for leaks and defects?	X			
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?		X		Permission for 50 ft buffer zone obtained from Michigan Fire Dept.
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	X			
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?		X	N/A	containers' contents are compatible

B. Facilities which store hazardous waste in tanks (Subpart J)

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				



5656 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909
Telephone 517 393-1500

a CIBA-GEIGY Company

November 14, 1980

EPA Region Office V
P.O. Box 7861
Chicago, Illinois 60680

Attn: Mr. Y.J. Kim

Re: EPA Generator Identification Number MID067352989
RCRA - Transporter Identification Number Request

Dear Mr. Kim:

We have filed the Notification of Hazardous Waste Activity Form (EPA Form 8700-12) with your office prior to August 18, 1980, and have received, in return, the above EPA Generator Identification Number.

We are, at this time, requesting that we be granted an EPA Highway Transporter Identification Number. We may decide in the near future, to develop and use a private motor carrier fleet to transport our own hazardous waste to designated EPA approved treatment and disposal facilities.

Sincerely yours,
Ciba-Geigy Corporation

N.L. Tartaglione
Plant Manager

NLT/da/l/A-10



5606 South Cedar Street
P.O. Box 23037
Lansing, Michigan 48909
Telephone 517 393-1500

a CIBA-GEIGY Company

April 21, 1981

Director
Enforcement Division
Region V
United States Environmental
Protection Agency
Water and Hazardous Materials
Enforcement Branch
230 South Dearborn Street
Chicago, Illinois 60604

Attention: Compliance Section

Re: In the Matter of CIBA-GEIGY Corporation,
Ren Plastics, East Lansing, Michigan
EPA ID No. MI D067352989
Docket No. V-W-81-R-67

Dear Sirs:

Ren Plastics ("Ren"), a CIBA-GEIGY Corporation company, has chosen not to contest the above-mentioned complaint dated March 18, 1981, a copy of which was received by CIBA-GEIGY Corporation's agent for service of process in Michigan on March 23, 1981. As required by Paragraph 2 of the Order issued in connection therewith, Ren hereby reports on its compliance with each item mandated by such Order:

- a. A written schedule exists for inspecting all safety, emergency and operating equipment and is being followed.
- b. Job titles and descriptions exist for all employees who work with hazardous waste and are on file. All training each employee receives shall be documented and kept on file.
- c. "No Smoking" signs are posted at all locations where ignitable or reactive wastes are stored and handled.
- d. Emergency communication equipment, specifically a telephone, is in place in the hazardous waste storage area.

- e. A record of all hazardous waste movements, amounts, storage methods is maintained as part of the facility operating record.
- f. All ignitable or reactive wastes are presently in storage at a suitable location 50 feet or greater from the property line.
- g. A contingency plan, regarding hazardous waste as part of Ren's Pollution Incident Prevention Plan, is in existence and will be maintained at the facility to deal with emergencies.

We trust that this fully responds to the requirements of the order.

Very truly yours,

Nicholas L. Tartaglione

Nicholas L. Tartaglione

Plant Manager

Ren Plastics

a CIBA-GEIGY Corporation Company

P.O. Box 23037

Lansing, Michigan 48909

Telephone 517 393-1500

NLT/no

5EWHME

MAR 30 1981

Mr. Michael Robinson
Lendman, Leyendyk & Associates
400 Terrace Plaza
Muskegon, Michigan 49443

Dear Mr. Robinson:

Enclosed is the Complaint and Notice of Opportunity for Hearing issued to
CIBA-GEIGY Corporation, Ren Plastics Division which you requested.

If you have any further questions, please call me at (312) 353-2110.

Your interest in this matter is appreciated.

Very truly yours,

Michael Mutnan, P.E.
Chemical Engineer

Enclosure

cc: Bloom

msm 2/30/81
MUTNAN:sri 3-2110 6-6770

RCRA ENFORCEMENT ACTION SIGN-OFF

Matus / Bloom

V-W-81-R-67

PART I. BACKGROUND

FACILITY NAME CIBA-GEIGY CORP
 FACILITY LOCATION EAST LANSING, MI
 RCRA ID NUMBER MI 0067352989
 NATURE OF VIOLATION 265.15(f), 265.16(d), 265.17(a), 265.32,
265.51-265.53, 265.73CB), 265.176.

PART II. RECOMMENDATION

RECOMMENDATION ORDER
 TYPE OF ACTION _____

NAME & DATE OF STATE CONTACT NOTIFIED Joe Boyle 3/5/81

Mailed 3/19/81 - RS.
 ANY OTHER OUTSTANDING ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER None

AIR None

PART III. CONCURRENCES

	INITIALS	DATE	AGREE	DISAGREE
PREPARER TECHNICAL	MSM	3/5	(X)	()
LEGAL BLOOM	ARB	3/5	(✓)	()
CHIEF, ENGINEERING UNIT I	WEM	3(9)81	(X)	()
act. CHIEF, ENGINEERING SECTION	CD	3(11)81	(X)	()
act. CHIEF, COMPLIANCE SECTION	WDM	3(11)81	(X)	()
CHIEF, CASE DEVELOPMENT UNIT	GFS	3(11)81	(X)	()
CHIEF, LEGAL SECTION	Kully	3(13)81	(X)	()
CHIEF, WATER & HAZ. MAT. ENF.BR.	KAF	(X)	()	()

PART IV. APPROVAL

DIRECTOR, ENFORCEMENT DIVISION

APPROVES ()

DISAPPROVES ()

Final Filter to JACK Baird

083017 MAR 81
KAF

MAR 1 8 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

5EWHME

The Corporation Company
Registered Agent for
CIBA-GEIGY Corporation
615 Griswold Street
Detroit, Michigan 48226

Re: Complaint and Notice of
Opportunity for Hearing
CIBA-GEIGY Corporation
Ren Plastics
EPA ID No. MI D067352989

Dear Sir:

Enclosed please find a Complaint which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. § 6901 et seq., based on an inspection of your facility at 4917 Dawn Avenue, East Lansing, Michigan, on December 8, 1980.

The Complaint and Order states the reason for such a determination, establishes a compliance schedule and advises that you may be liable for civil penalties should you fail to meet the time specified in the Order for corrective action. This Complaint and Order is issued pursuant to Section 3008 of RCRA (42 U.S.C. § 6928).

Accompanying the Complaint and Order is a Notice of Opportunity for Hearing and a copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits. It is recommended that the enclosed Complaint and Rules of Practice, 40 CFR Part 22, 45 Fed. Reg. 24360 (April 9, 1980), as amended by 45 Fed. Reg. 79808, (December 2, 1980), be carefully read and analyzed to determine the alternatives available in responding to the Order and Opportunity for Hearing. Should you desire to contest the Complaint, a written request for a hearing is required 30 days from receipt of this Complaint.

Regardless of whether you choose to request a hearing within the prescribed time limit following service of the Complaint, you are extended an opportunity to request an informal settlement conference. If you have any questions or desire to request an informal conference for the purpose of settlement with the Enforcement Division staff, please contact Mr. Michael Mutnan, Enforcement Division, Water and Hazardous Materials Enforcement Branch, Engineering Section, 230 South Dearborn Street, Chicago, Illinois 60604. Telephone (312) 353-2110.

Any request for a settlement conference will not affect the time requirements for filing an answer to the complaint.

Very truly yours,

Original Signed by Sandra S. Gardebring

Sandra S. Gardebring
Director, Enforcement Division

Enclosure

cc: Tom Work, Resource Recovery Director
Michigan Department of Natural
Resources

Stewart Freeman
Office of Michigan Attorney General

bcc: Region V, Compliance Section, Donaldson/David N. Lyons, Chief
Compliance Branch
Office of Water Enforcement (EN-338)

MJM 3/5/81
RW

MUTNAN/nfs 3/2/81

Bloom
~~MUTNAN~~ *ERP*

MUNO

WEM 3/9/81

MINER EDD (acting)

RWC 3/13
YES 3/11/81

GROMNICKI *3/13*

FENNER *KAP*

BRYSON *AB*

GARDEBRING

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF

CIBA-GEIGY CORPORATION
REN PLASTICS
EAST LANSING, MICHIGAN

EPA ID NO. MI D067352989

DOCKET NO.: V-W-81-R-67

COMPLAINT AND
NOTICE OF OPPORTUNITY
FOR HEARING

This Complaint is pursuant to Section 3008 of the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. § 6928, and is equivalent to a Compliance Order referred to in that Section. The Complainant is the Regional Administrator, Region V, United States Environmental Protection Agency (U.S. EPA). The respondent is CIBA-GEIGY Corporation, a corporation which is authorized to do business in Michigan and has a place of business located at 4917 Dawn Avenue, East Lansing, Michigan (Facility).

Pursuant to 42 U.S.C. § 6928(a) and based on a compliance investigation of the Facility conducted by the U.S. EPA on December 8, 1980, it has been determined that the above-named respondent is in violation of RCRA. Specifically, it has been determined that CIBA-GEIGY Corporation is in violation of Subtitle C of RCRA, Section 3004, 42 U.S.C. § 6924 and regulations 40 C.F.R. Parts 265.15(b), 265.16(d), 265.17(a), 265.32, 265.51 through 265.53, 265.73(b) and 265.176.

FINDINGS

This determination is based upon the following findings of violation:

1. Pursuant to 265.15(b) the owner/operator is required to develop a written schedule for inspecting all monitoring, safety, emergency and operating equipment at the facility. At the time of the inspection the owner/operator had no written inspection schedule as required by 40 C.F.R. § 265.15(b).
2. Pursuant to 40 C.F.R. § 265.16(d), the owner/operator is required to maintain a document describing the name and job title for each employee who works with hazardous waste, a written job description for each employee, the training each employee has or will receive and records documenting the training and job experience of each employee. At the time of the inspection, no such document was maintained as required by 40 C.F.R. § 265.16(d).

RECEIVED

MAR 20 1981

3. Pursuant to 265.17, the owner/operator is required to have "No Smoking" signs in locations where there is a hazard from ignitable or reactive waste. At the time of the inspection, "No Smoking" signs were absent from areas where reactive and ignitable waste were stored as required by 40 C.F.R. § 265.17.

4. Pursuant to 40 C.F.R. § 265.32, the owner/operator is required to equip the facility with emergency communication equipment. At the time of the inspection, the owner/operator had no communication equipment within its storage area as required by 40 C.F.R. § 265.32.

5. Pursuant to 40 C.F.R. § 265.51 through 265.53, the owner/operator is required to prepare, maintain and follow a contingency plan to deal with incidents at the facility. At the time of the inspection, the owner/operator could not produce a plan as required by 40 C.F.R. § 265.51 and 265.53.

6. Pursuant to 40 C.F.R. § 265.73(b), the owner/operator is required to maintain a record of all hazardous waste received, its movement, dates and method of storage, quantities and locations. At the time of the inspection, no such records could be produced as required by 40 C.F.R. § 265.73(b).

7. Pursuant to 40 C.F.R. § 265.176, the owner/operator is required to locate containers holding ignitable or reactive wastes at least 50 feet from the property line. At the time of the inspection containers holding ignitable waste were located 45 feet or less from the property line which is in violation of 40 C.F.R. § 265.176.

ORDER

IT IS HEREBY ORDERED that CIBA-GEIGY Corporation take the following corrective actions within the specified times for achieving compliance with Subtitle C of RCRA, Section 3005, 42 U.S.C. § 6925 and regulations 40 C.F.R. § 265.15(b), 265.16(d), 265.17(a), 265.32, 265.51 through 265.53, 265.73(b) and 265.176.

1. The owner/operator shall, within 30 days of receipt of this Order, achieve compliance with the following requirements:

- a. A written inspection schedule shall be developed for all monitoring, safety, emergency and operating equipment at the hazardous waste facility and implemented.

- b. Job titles and descriptions shall be prepared for all employees who work with hazardous waste and shall be kept on file and all training each employee has received shall be documented and kept on file.
 - c. "No Smoking" signs shall be posted at all locations where ignitable or reactive wastes constitute a hazard.
 - d. Emergency communication equipment shall be installed within the hazardous waste storage area.
 - e. A record of all hazardous waste movements, amounts, storage locations and storage methods shall be maintained.
 - f. All ignitable or reactive wastes presently in storage at a location under 50 feet from the property line shall be moved to a suitable location 50 feet or greater from the property line.
 - g. Prepare and maintain at the facility a contingency plan to deal with emergencies.
2. The owner/operator shall notify the U.S. EPA in writing upon achieving compliance with this Order and any part thereof. This notification shall be submitted to the Director, Enforcement Division, Region V, United States Environmental Protection Agency, Water and Hazardous Materials Enforcement Branch, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Compliance Section.
- Failure to comply with any requirement of this Compliance Order shall subject the above-named respondent to liability for a civil penalty of up to \$25,000.00 (TWENTY-FIVE THOUSAND DOLLARS) for each day of continued noncompliance. U.S. EPA is authorized to assess such penalties pursuant to Section 3008(a)(3).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named person is hereby notified that the above Order shall become final unless said person has requested in writing a public hearing on the Order no later than 30 days from the date this Order is served. You have the right to request a hearing to contest any factual allegation set forth in the Complaint or the appropriateness of any proposed compliance schedule or penalty. In the event

that you wish to request a hearing, and to avoid having the Compliance Order become final without further proceedings, you must file a written answer to this complaint with the Regional Hearing Clerk, U.S. EPA , Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days of your receipt of this notice. A copy of this answer and any subsequent document filed in this action should also be sent to Enforcement Division, Attention: Water & Hazardous Materials Enforcement Branch, Compliance Section at the same address. Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which you have knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which you intend to place at issue in the hearing. The denial of any material fact or the raising of any affirmative defense shall be construed as a request for a hearing.

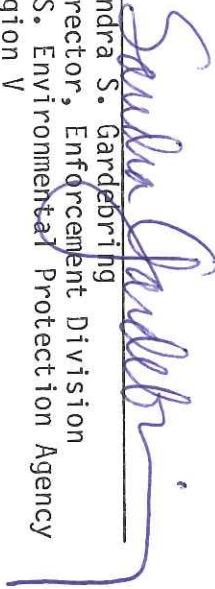
A copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits (40 C.F.R. 22, 45 Federal Register 24363 as amended by 45 Federal Register 79808), accompanies this Complaint. These regulations are applicable to this administrative action.

SETTLEMENT CONFERENCE

Whether or not you request a hearing, you may confer informally with EPA concerning (1) whether the alleged violations in fact occurred as set forth above, (2) the appropriateness of the compliance schedule, (3) the appropriateness of any proposed penalty in relation to the size of your business, the gravity of the violations, and the effect of the proposed penalty on your ability to continue in business. You may request an informal settlement conference at any time by contacting this office. However, any such request will not affect the thirty day time limit for responding to this Complaint or requesting a formal hearing on the violations alleged herein. U.S. EPA encourages all parties to pursue to possibilities of settlement through informal conferences.

Request for an informal conference or service of document should be made to
Mr. Michael Mutnan, Enforcement Division, at the above address, telephone number,
(312) 353-2110.

Dated this 18th day of March, 1981.


Sandra S. Gardebring
Director, Enforcement Division
U.S. Environmental Protection Agency
Region V

Date: 12/23/80

Referral Number: MJH-81-6

Region V Site No: M/D 067352989

HAZARDOUS WASTE REFERRAL

Contacts

Ralph Feeney *RF*
Compliance Section

RCRA

M. M. Muthen
Engineering Section

Bloom
Legal Section

Site Name: CIBA-GEIGY Corporation REN PLASTICS

Site Location: 4917 Dawn Avenue
East Lansing Mich. 48823

Mailing Address → P.O. Box 23057
Lansing, Mich.
48909

Owner/Operator: Nick Tartagliere, (Plant Manager)

Permitted Site:

Permit Number & Issue Date (if applicable):

Apparent Violations:

- 1) Facility did not have danger signs at entrance - 265.14(c)
- 2) Facility did not maintain a log of inspections - 265.15(d)
- 3) Records of malfunctions, operator error and inspections of safety and emergency equipment were not available. - 265.16(d)
- 4) Personnel training records did not include job titles, descriptions of training or records of training - 265.16(e)

Assigned 12/24/80

5) Facility did not have no smoking signs in areas where there is a hazard from ignitable or reactive wastes - 265.17(a)

6) Facility did not have an alarm system or a telephone or 2-way radio system - 265.32(a)(b).

7) Contingency plan does not include actions facility personnel must take to comply with 264.51 and 265.56.

8) No arrangements with local emergency organizations - 264.37

List Supporting Documentation

(MDR's, Letters, Reports, Phone Memos, Field Surveys, Photographs, etc.)

9) Contingency plan lacked a list of all emergency equipment - 265.52(e)

10) Contingency plan lacked an evacuation plan - 265.52(f)

11) Copies of the Contingency plan are not available ~~at~~ at site or local emergency authorities - 265.52

12) The facility does not maintain an operating record as required in 265.73.

List Previous violations and subsequent action taken:

13) ^{Ignitable} Wastes stored in containers are stored within 50 feet of ~~facility's~~ facility's property line - 265.176

Compliance Section Recommendations:

Technical Evaluation and Action Development
(To be filled out by Engineering Section)

Date Received: _____

12/24/60

Assigned to: _____

MUTNAN

Date Evaluation and Action Development
to be Completed: _____

Additional Contacts/Documentation Developed
(including phone memos to or from permittee and to or from State):

Engineering Section Recommendation:

Specify, Develop and Attach Action Documents:
(including cover memos)

Legal Evaluation
(To be filled out by Legal Section)

Date Received: _____

Assigned to: _____

Date Review to be Completed: _____

Additional Contacts/Documentation Developed
(including phone memos to or from permittee and to or from State):

Legal Section Recommendation:

REMARKS
(To be filled out as appropriate)

ACTION INITIATED
(To be filled out by Compliance Section)

TYPE OF ACTION: _____

Date INITIATED: _____

DATE CLOSED OUT: _____

23 DEC 1980

5EWHME

Mr. Nick Tartaglione,
Plant Manager
CIBA-GEIGY Corporation,
Ren Plastics
4917 Dawn Avenue
East Lansing, Michigan 48823

RE: CIBA-GEIGY Corp., Ren Plastics
E. Lansing, MI, MID067352989

Dear Mr. Tartaglione:

Representatives of the United States Environmental Protection Agency
(U.S. EPA) inspected your facility on December 8, 1980. This report is
forwarded for your information.

If you have any questions concerning this inspection report, please contact
Mr. Ralph Feeney of the Water & Hazardous Materials Compliance Section at
(312) 353-2114.

Very truly yours,

Original Signed by: Arnold E. Leder

Arnold E. Leder
Chief, Compliance Section
Water & Hazardous Materials
Enforcement Branch

Enclosure

cc: Dr. Howard A. Tanner
Director, Michigan Department of
Natural Resources

bcc: Dennis Armbruster, Michigan
Department of Natural Resources

Constantelos
Boyle
Leder
Baumgartner
Feeney

RFEENEY/fw/12-22-80:6-6715

MID 067 352 989

"SOFT-HAMMER" WASTES

2214

LAND DISPOSAL RESTRICTION NOTIFICATION AND CERTIFICATION FORM

CIBA GEIGY

1-27-93

RECEIVED
WMD RCRA
RECORD CENTER

Comp

Manifest Number: IL21544874

Generator Name: CIBA GEIGY

EPA ID Number: MID000010073

CWM Profile Number: 2A6156933

This form is submitted to SCA in accordance with 40 CFR Part 268, which restricts the land disposal of certain hazardous wastes. I have marked the appropriate box below to indicate whether alternative treatment has been found for my waste. (See reverse side for the list of "soft-hammer" wastes and instructions on using this form.)

☒ I. SOFT-HAMMER WASTE FOR WHICH ALTERNATIVE TREATMENT OR RECOVERY HAS BEEN LOCATED

The soft-hammer waste I generate is(are)

~~WASTE~~ 4226 U159

I have identified a practically available treatment technology that yields the greatest environmental benefit. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(1), including a list of facilities and facility officials contacted, complete with addresses, telephone numbers, and contact dates, and a justification that I have chosen the best treatment that is practically available.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

☐ II. SOFT-HAMMER WASTE FOR WHICH DISPOSAL IN LANDFILL OR SURFACE IMPOUNDMENT IS THE ONLY PRACTICAL ALTERNATIVE TO TREATMENT CURRENTLY AVAILABLE

The soft-hammer waste(s) I generate or have treated is(are)

I have made a good-faith effort to locate and contract with treatment and recovery facilities practically available which can meaningfully reduce the toxicity or mobility of hazardous constituents in the waste, as an alternative to land disposal. I have found no such alternative facility. Together with the initial shipment of waste represented by this form, I submitted a demonstration in accordance with 40 CFR 268.8(a)(2), including a list of facilities and facility officials contacted, addresses, telephone numbers, contact dates, and an explanation of why no treatment is practically available. This soft-hammer waste must be disposed of in a landfill or surface impoundment meeting the minimum technological standards until treatment standards are set for the waste or May 8, 1990, whichever occurs first.

"I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

☐ III. TREATMENT OR RECOVERY FACILITY HAS TREATED THE WASTE

The following soft-hammer waste(s) was treated in accordance with the generator's demonstration:

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with treatment as specified in the generator's demonstration. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

☐ IV. SOFT-HAMMER WASTE DESTINED FOR LAND DISPOSAL OTHER THAN IN LANDFILL OR SURFACE IMPOUNDMENT (e.g. DEEP INJECTION WELL)

The soft-hammer waste(s) I generate is(are)

This waste is being disposed of in a land disposal unit other than a landfill or surface impoundment and therefore is not subject to the certification and demonstration requirements of Section II.

Signature

Michael Blood

Title

CAB TECH

Date

9-22-88



SOFT HAMMER DEMONSTRATION / CERTIFICATION

To: US Environmental Protection Agency
Region 5
Attention: Valdas V. Adamkus
230 South Dearborn
Chicago, Illinois 60604

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes,

CIBA GEIGY has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8 (a)(2) for EPA waste code(s) ~~WASTE~~ 4226 U159

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment, we have determined that:

- 1.) No practically available treatment exist. (see attached demonstration for further details).
- X 2.) Incineration is the best practically available treatment. (see attached demonstration for further details)

If any further information is required, please contact me at 313-585-7200 (phone #)

Michael Baloch

(Generator's signature)

LAB TECH

(title)

SOFT HAMMER DEMONSTRATION

Attachment 2

FACILITIES CONTACTED	FACILITY OWNER / LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE	EXPLANATION*
<input checked="" type="checkbox"/>	Chemical Waste Management Emelle Facility Hwy 17 at Mile marker # 163 Emelle, Alabama 35459	Landfill	(205) 652-9721	Jim Buckley		
<input checked="" type="checkbox"/>	CWM - Solvent Resource & Recovery 4301 Infirmary Road West Carrollton, Ohio 45499	Solvent Recovery	(513) 859-6101	Carol Moody		
<input type="checkbox"/>	Adams Center Landfill, Inc. 4636 Adams Center Road Fort Wayne, Indiana 46806	Landfill	(219) 447-5585			
<input type="checkbox"/>	CWM - Trade Waste Incineration #7 Mobile Drive Sauget, Illinois 62201	Incineration	(618) 271-2804	Teri Johnson		
<input checked="" type="checkbox"/>	CWM - SCA Chemical Services 11700 So. Stoney Island Chicago, Illinois 60617	Incineration	(312) 646-5700	Dan Locke		

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Mary Wojciechowski
Date: December 7, 1993

Background Facility Information

Facility Name: Ciba Giegy Corporation
EPA Identification No.: MID 067 352 989
Location (City, State): East Lansing, Michigan
Facility Priority Rank: Low

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

Entire facility which consists of 3 SWMUs.

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)
☒ RCRA Facility Assessment (RFA) or equivalent completed
☐ RCRA Facility Investigation (RFI) underway
☐ RFI completed
☐ Corrective Measures Study (CMS) completed
☐ Corrective Measures Implementation (CMI) begun or completed
☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
☐ Post-closure permit
☐ Enforcement order
☒ Other (Explain)

Remediation was conducted under the provisions of Michigan Act 307.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
☐ No
☐ Uncertain; still underway
☒ Not required

Additional explanatory notes:

Interim measures were not required. However, the facility was placed on the Michigan Act 307 list because of soil contamination and was subsequently removed from the list when the soil was removed.

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☒ Groundwater
☐ Surface water
☐ Air
☒ Soils

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- ☐ No
☒ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
☐ No
☒ Uncertain

Additional explanatory notes:

PCE was found in off-site monitoring wells, but it is not known if contamination originated from the facility.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

PCE was found in off-site monitoring wells, but it is not known if contamination originated from the facility.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
☐ No
☒ Uncertain

Additional explanatory notes:

PCE was found in off-site monitoring wells, but it is not known if contamination originated from the facility.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

PCE was found in off-site monitoring wells, but it is not known if contamination originated from the facility.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

Final corrective measures have not been identified or planned.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

Further information on the source nature and extent of PCE in groundwater is necessary.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes
☐ No
☒ Uncertain

Additional explanatory notes:

Further information on the source nature and extent of PCE in groundwater is necessary.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☒ Dissolved in groundwater or surface water
☐ Gaseous
☐ Other _____

13. Which of the following major chemical groupings are of concern at the facility?

☒ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☐ Inorganics and metals
☐ Explosives
☐ Other _____

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

☐ Yes; Indicate possible course of action.

☒ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

Further information on the source nature and extent of PCE in groundwater is necessary.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

☐ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

☐ Yes
☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- ☐ Yes
- ☐ No, not feasible
- ☐ No, not required
- ☒ Further investigation necessary

Explain final decision, using additional sheets if necessary.

The following information was obtained from a 1993 PA/VSI by PRC.

The facility was placed on the Michigan Act 307 list because of nonhalogenated VOC soil contamination from some former USTs. The facility was removed from this list when contaminated soil was removed.

Monitoring wells east of the facility revealed significant levels of PCE in groundwater. The facility claims to have never used PCE. On-site monitoring wells should be installed to see if PCE exists in groundwater beneath the facility and to help determine the source of the contamination.

ENFORCEMENT
CONFIDENTIAL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

December 9, 1993

RECEIVED
WMD RCRA
RECORD CENTER
DEC 17 1993

Mr. Mike Munsell
Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, MI 48823

Re: Visual Site Inspection
Ciba-Geigy Corporation
East Lansing, MI
MID 067 352 989

Dear Mr. Munsell:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**CIBA-GEIGY CORPORATION
EAST LANSING, MICHIGAN
MID 067 352 989**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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INITIALS *WV*

EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Ciba-Geigy Corporation (Ciba-Geigy) facility in East Lansing, Ingham County, Michigan. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs identified.

The facility occupies 3 acres in a mixed-use industrial and commercial area. The Ciba-Geigy facility manufactures formulated epoxy and urethane thermoset systems. Ciba-Geigy operates a number of batch chemical processes. Process operations consist of charging raw material in a mixer or reactor. The material is either mixed or reacted and the product is removed. The mixer or reactor is cleaned with solvents. Process equipment is also cleaned. These operations generate the following hazardous waste streams: flammable rags (D001 and F005), off-specification and outdated urethane hardener (D009), spent halogenated flush solvent (F002), and ignitable spent solvent (D001 and F005). The Ciba-Geigy facility also generates nonhazardous off-specification reacted resins, acrylics, and isocyanates.

The facility has operated at its current location since 1952 and employs about 115 people. The facility consists of one manufacturing and warehouse building that also contains office space, finished goods storage space, a mixing room, a pilot plant, and packaging areas. The facility has eight aboveground storage tanks for raw material storage. Facility operations have remained essentially the same since Ciba-Geigy built the facility in 1952. According to facility representatives, a tool and die shop was located on the facility property before Ciba-Geigy began operations. Land use of the facility property before the tool and die shop is unknown. Ciba-Geigy is the facility's sole owner and operator.

The facility's current regulatory status is that of an interim status storage facility storing hazardous waste on site for less than 90 days. The facility submitted a Notification of Hazardous Waste Activity to EPA on August 7, 1980 as a generator and treatment, storage, or disposal facility. The Ciba-Geigy facility submitted a Part A permit application for Hazardous Waste Storage Area III (SWMU 3)

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in 1980. In 1986, Ciba-Geigy submitted a revised Part A permit application which included two additional hazardous waste storage areas: Hazardous Waste Storage Area I (SWMU 1) and Hazardous Waste Storage Area II (SWMU 2). Hazardous Waste Storage Areas I, II, and III underwent RCRA-related closure activities in 1989. Closure certification had not yet been approved by the Michigan Department of Natural Resources (MDNR) at the time of the VSI.

In 1985, 10 underground storage tanks (USTs) which had contained product were removed from the facility. After removal of the USTs, split-spooned soil samples were collected in 1985. Analytical results showed no contamination except at the 10 foot below ground surface (bgs) level. Based on the analytical results of the soil samples and the hydrogeologic conditions on site, the subsequent excavation of the tank area was extended about 1 foot into the grey clay layer. As a result of the release from the USTs, the Ciba-Geigy facility was placed on the Michigan Act 307 list. Soil borings collected in 1987, 1988, and 1989 contained nondetectable levels of all EPA Method 601 and 602 compounds except for toluene which was detected at 1 part per billion. Therefore, the facility is no longer included on the Michigan Act 307 list.

The PA/VSI identified the following three SWMUs at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Area I
2. Hazardous Waste Storage Area II
3. Hazardous Waste Storage Area III

No AOCs were identified during the PA/VSI.

The potential for release to groundwater, air, and on-site soils from all SWMUs is low. The units manage waste in containers of 55-gallons or less and are located on concrete or asphalt. Drums are stored closed when waste is not being added. The potential for release to surface water from Hazardous Waste Storage Areas I and II (SWMUs 1 and 2) is low because they are located indoors on a concrete floor. All drums are stored closed and wastes are managed in 55-gallon drums.

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The potential for release to surface water from Hazardous Waste Storage Area III (SWMU 3) is low. A stormwater drain which discharges directly to the Red Cedar River is located 40 feet south of the unit. According to facility representatives, this drain is plugged and stormwater accumulated in the catch basins are visually inspected to ensure a release has not occurred before the plugs are opened and the stormwater is released.

The facility is located in East Lansing, Michigan. The nearest residence is located about 50 feet east of the facility. Facility access is controlled by a 6-foot-high fence that surrounds the facility.

The nearest surface water body, Red Cedar River, is located about 40 feet southwest of the facility and is used for surface water run-off. The nearest sensitive environment, a seasonally forested palustrine wetland, is located about 200 feet southeast of the facility.

Groundwater is used as a source of drinking water in the area. The nearest drinking water wells are in the East Lansing municipal well field located 0.5 mile south and downgradient of the facility. The Red Cedar River is located between the facility and these wells. The nearest well is located 200 feet east of the facility and is a groundwater monitoring well.

PRC recommends MDNR resolve the status of SWMUs 1, 2, and 3.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Ciba-Geigy Corporation (Ciba-Geigy) facility (EPA Identification No. MHD 067 352 989) in East Lansing, Ingham County, Michigan. The PA was

completed on May 20, 1993. PRC gathered and reviewed information from the Federal Emergency Management Agency (FEMA); the Michigan Department of Natural Resources (MDNR); the National Weather Service (NWS); the U.S. Department of the Interior (DOI); the U.S. Geological Survey (USGS); and from EPA Region 5 RCRA files. The VSI was conducted on May 26, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified three SWMUs at the facility.

The VSI is summarized and five inspection photographs are included in Appendix A. Field notes from the VSI are included in Appendix B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The Ciba-Geigy facility is located at 4917 Dawn Avenue in East Lansing, Ingham County, Michigan (latitude 42°43'31"N and longitude 84°27'06"W), as shown in Figure 1 (Ciba-Geigy, 1980b). The facility occupies 3 acres in a mixed-use industrial and commercial area.

The Ciba-Geigy facility is bordered on the north by Tufty Shocks, Brakes and Mufflers; on the west by Capitol Lighting Company; on the south by Cruse Communication Company; and on the east by a residence and a facility under construction.

2.2 FACILITY OPERATIONS

The Ciba-Geigy facility manufactures formulated epoxy and urethane thermoset systems. Ciba-Geigy operates a number of batch chemical processes. Process operations consist of charging raw material in a mixer or reactor. The materials are then either mixed or reacted and the finished product is removed. The mixer or reactor is then cleaned with solvents. Process equipment is also cleaned.

The facility has operated at its current location since 1952 and employs about 115 people. The facility consists of one manufacturing and warehouse building that also contains office space, finished goods storage space, a mixing room, a pilot plant, and packaging areas. Outside of the building are Hazardous Waste Storage Area III (SWMU 3) and parking areas. The facility has 89,830 square feet of indoor space.

Currently the facility has the following aboveground, indoor storage tanks:

- One 10000-gallon tank containing polymethylene polyphenyl isocyanate
- One 10000-gallon tank containing polyester triol
- One 6000-gallon tank and one 4000-gallon tank containing epoxy resin
- Three 4000-gallon tanks containing epoxy resin

Facility operations have remained almost the same since Ciba-Geigy built the facility in 1952.

According to facility representatives, a tool and die shop was located on the facility property before Ciba-Geigy began operations. Land use of the facility property before the tool and die shop is unknown.

2.3 WASTE GENERATION AND MANAGEMENT

This section describes waste generation and management at the Ciba-Geigy facility. The facility generates the following hazardous waste streams: flammable rags (D001 and F005), off-specification and outdated urethane hardener (D009), spent halogenated flush solvent (F002), and ignitable spent solvent (D001 and F005). The facility also generates a nonhazardous waste stream consisting of off-specification reacted resins, acrylics, and isocyanates. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs, is shown in Figure 2. The facility's waste streams are summarized in Table 2. Annual waste generation rates presented below are based on 1992 data.

Flammable rags (D001 and F005) are generated when rags are soaked with flammable solvents and alcohols used to clean equipment. The rags are accumulated and stored in 55-gallon drums at Hazardous Waste Storage Area II (SWMU 2). The full drums are then taken to Hazardous Waste Storage Area III (SWMU 3). The flammable rags are transported off site by Clean Harbors, Inc. (Clean Harbors), to its facility in Chicago, Illinois, where they are used for fuel blending. Ciba-Geigy generates about 8,000 pounds of this waste annually (Ciba-Geigy 1993).

TABLE 1
SOLID WASTE MANAGEMENT UNITS

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit^a</u>	<u>Status</u>
1	Hazardous Waste Storage Area I	Yes	Facility completed closure activities for this unit in 1989 and has submitted closure certification to MDNR; active, currently stores hazardous waste for less than 90 days
2	Hazardous Waste Storage Area II	Yes	Facility completed closure activities for this unit in 1989 and has submitted closure certification to MDNR; active, currently stores hazardous waste for less than 90 days
3	Hazardous Waste Storage Area III	Yes	Facility completed closure activities for this unit in 1989 and has submitted closure certification to MDNR; active, currently stores hazardous waste for less than 90 days

Note:

^a A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

←Z←

DAWN AVENUE

PROPERTY LINE

MIXING ROOM
SWMU 1

PILOT PLANT
SWMU 2

PACKAGING

MANUFACTURING/
WAREHOUSE
BUILDING

OFFICE

FINISHED
GOODS

CONCRETE PAD
SWMU 3

ASPHALT

PROPERTY LINE

PROPERTY LINE

RED CEDAR RIVER
FLOW

SOLID WASTE MANAGEMENT UNITS

- SWMU 1 HAZARDOUS WASTE STORAGE AREA I
- SWMU 2 HAZARDOUS WASTE STORAGE AREA II
- SWMU 3 HAZARDOUS WASTE STORAGE AREA III

LEGEND

- APPROXIMATE LOCATION OF STORM SEWER AND CATCH BASINS

CIBA-GEIGY CORPORATION
EAST LANSING, MICHIGAN

FIGURE 2

FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code ^a	Source	Solid Waste Management Unit
Flammable rags/(D001 and F005)	Equipment cleaning	2 and 3
Off-specification and outdated urethane hardener/(D009)	Off-specification and outdated product manufacture	1 and 3
Spent halogenated flush solvent/(F002)	Equipment cleaning	1, 2, and 3
Ignitable spent solvent/(D001 and F005)	Equipment cleaning	1, 2, and 3
Nonhazardous reacted resins, acrylics, and isocyanates/NA	Off-specification product manufacture	1 and 3

Notes:

^a Not applicable (NA) designates nonhazardous waste.

Off-specification and outdated urethane hardener (D009) is generated from off-specification and outdated product manufactured at the facility. The hardeners contain a small amount of mercury, and the waste is classified as hazardous for mercury (D009). The off-specification and out-dated urethane hardener (D009) is accumulated and stored in 55-gallon drums at Hazardous Waste Storage Area I (SWMU 1). The full drums are then taken to Hazardous Waste Storage Area III (SWMU 3). The waste is transported off site by Clean Harbors to its facility in Chicago, Illinois, for fuel blending. Ciba-Geigy generates about 3,900 pounds of this waste annually (Ciba-Geigy 1993).

Spent halogenated flush solvent (F002) is generated from flushing metering, mixing, and dispensing equipment with 1,1,1-trichloroethane. The halogenated flush solvent (F002) is accumulated in 55-gallon drums in Hazardous Waste Storage Areas I and II (SWMUs 1 and 2). The full drums are then taken to Hazardous Waste Storage Area III (SWMU 3). The drums are transported by Clean Harbors to its facility in Chicago, Illinois, for recovery. Ciba-Geigy generates about 6,600 pounds of this waste annually (Ciba-Geigy 1993).

Ignitable spent solvent (D001 and F005) is generated from cleaning mixing equipment. These spent solvents consist of ethanol, HiSol 10, amyl alcohol, and toluene. The ignitable spent solvents (D001 and F005) are accumulated and stored in 55-gallon drums in Hazardous Waste Storage Areas I and II (SWMUs 1 and 2). The full drums are then taken to Hazardous Waste Storage Area III (SWMU 3). This waste is transported by Hazmat Environmental Services to the Safety-Kleen Corporation facility in Dolton, Illinois, for fuel blending. Ciba-Geigy generates about 38,000 pounds of this waste annually (Ciba-Geigy 1993).

Nonhazardous reacted resins, acrylics, and isocyanates are generated from off-specification materials products. These wastes are accumulated in 55-gallon drums in Hazardous Waste Storage Area I (SWMU 1) and are taken to Hazardous Waste Storage Area III (SWMU 3). The waste is transported by Clean Harbors to its facility in Chicago, Illinois, for fuel blending. A small percentage of this waste does not have sufficient heating value for fuels blending and is landfilled. Ciba-Geigy generates approximately 60,000 pounds of this waste annually (PRC 1993).

2.4

HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility.

In September 1985, Ciba-Geigy requested that Snell Environmental Group, Inc. (SEG), remove 10 underground storage tanks (UST) from the facility. Seven of the tanks previously contained toluene, propylene oxide, ethanol, triethylene tetramine, and diethylene triamine. Two of the remaining three tanks contained paraffin oil and fuel oil, and the last was empty (SEG 1986).

After the tanks were removed, split-spoon soil samples were collected from at 5, 10, and 15 feet below ground surface (bgs) and at the top of the underlying clay layer at 11 feet bgs. Analytical results from the soil samples revealed no contamination except at the 10 foot bgs level, which contained some contamination (SEG 1986).

Based on the analytical results of the soils samples and the hydrogeologic conditions onsite, MDNR and Ciba-Geigy concluded that the soil contamination would be vertically contained by the grey clay layer underlying the facility at 11 feet bgs. The subsequent excavation of contaminated soil in the tank area was extended to about 11 to 12 feet bgs and about 1 foot into the grey clay layer. The excavation was backfilled with clean sand (SEG 1986).

As a result of the release from the USTs, the Ciba-Geigy facility was placed on the Michigan Act 307 list. Soil borings were collected 1987, 1988, and 1989 after the contaminated soil in the UST area had been excavated, and the area backfilled with clean sand. These borings contained nondetectable levels of all EPA Method 601 and 602 compounds except for toluene which was detected at 1 part per billion in two of five samples. After the submission of these results, the facility is no longer included on the Michigan Act 307 list.

Four groundwater monitoring wells are located east and off-site of the facility. In 1989, perchloroethylene was detected at 20 parts per billion in one of the wells. MDNR suspected that the contamination was not attributable to the facility, but was the result of dumping by a "backyard mechanic" because on-site surface soil did not reveal contamination (MDNR 1992). Groundwater

monitoring results from the remaining three wells have not revealed hazardous constituents at levels exceeding detection limits (ESE 1992).

No other releases to groundwater, surface water, air, or on-site soils have been documented at the facility.

2.5 REGULATORY HISTORY

The Ciba-Geigy facility submitted a Notification of Hazardous Waste Activity form to EPA on August 7, 1980, as a treatment, storage, or disposal facility (Ciba-Geigy 1980a). The facility submitted a RCRA Part A permit application on November 14, 1980. The application listed container storage (S01) for Hazardous Waste Storage Area III (SWMU 3) at a capacity of 8,250 gallons. This application listed the following waste codes: F002, F003, F005, U002, U008, U009, U028, U069, U107, U118, U159, U162, U220, U221, U226, D001, D002, D003, and D004 (Ciba-Geigy 1980b). On June 11, 1982, EPA acknowledged interim status for the Ciba-Geigy facility (EPA, 1982). On October 27, 1986, Ciba-Geigy submitted a revised Part A permit application to EPA (Ciba-Geigy 1986). This application also included container storage in the Hazardous Waste Storage Areas I and II (SWMU 1 and 2). This application was accepted by MDNR on November 19, 1986 (MDNR 1986b).

Ciba-Geigy submitted a closure plan to MDNR because the facility did not wish to pursue a Part B permit. On January 9, 1989, MDNR approved the facility's closure plan submitted in November 1988 (MDNR 1989a). Hazardous Waste Storage Areas I, II, and III (SWMUs 1, 2, and 3) underwent RCRA closure activities on June 26, 1989. The units were triple rinsed, and the rinsewater was collected in 55-gallon drums. The rinsewater was analyzed for mercury, ignitability, and volatile organic compounds. This documentation has been submitted to MDNR. MDNR has not yet approved the closure activities. The Ciba-Geigy facility is currently operating as an interim status storage facility until its closure is approved. However, the facility stores hazardous waste for less than 90 days only.

In the past, Ciba-Geigy has had minor RCRA compliance problems. MDNR conducted RCRA compliance inspections in 1983, 1984, 1985, 1986, 1987, 1988, 1989, and 1990. The facility was

cited for deficiencies in the contingency plan, training program, and training records. The facility was also cited for cracks and for inadequate secondary containment in Hazardous Waste Storage Area III (SWMU 3) (MDNR 1983a, 1983b, 1984, 1985, 1986a, 1987, 1988, 1989b, and 1990). The facility is currently in compliance.

The facility is required to have operating air permits. Ciba-Geigy has numerous air permits for the process and control equipment, and various raw material and product formulation operations. Ciba-Geigy operates under the following air permit numbers issued by MDNR: 122-88, 134-82, 285-90, 480-91, 537-80, 538-80, 539-80, 580-88, 677-86, 688-80, 690-80, 691-80, 807-80, 808-80, 809-80, and 871-90 (Ciba-Geigy 1992).

The facility is not required to have a National Pollutant Discharge Elimination System (NPDES) permit. No CERCLA activity has taken place at the facility.

In 1986 10 USTs were removed from the facility. Based on sampling results from the soil removal, the facility was placed on the Michigan Act 307 list. The facility was removed from this list as a result of subsequent sampling conducted in 1989. See Section 2.4 for additional information regarding facility USTs.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

2.6.1 Climate

The climate in Ingham County is characterized by mild continental conditions. Weather conditions are monitored at the Capital City Airport in Lansing, Michigan. The annual average temperature is 37.2°F, and the annual average high temperature is 57.1°F. The annual average precipitation is 29.58 inches and is moderately distributed over the year, with peak rainfall in June. The annual average evaporation rate is 30 to 32 inches. The 1-year, 24-hour rainfall value is 2.0 inches. The

prevailing wind direction is southwest at an average speed of 10 miles per hour (National Weather Service 1990).

2.6.2 Flood Plain and Surface Water

The Ciba-Geigy facility is not located in a 100-year flood plain (FEMA 1977). The nearest surface water body, Red Cedar River is located about 40 feet southwest of the facility. The Red Cedar River is used for surface water run-off. The Red Cedar River discharges to the Grand River, in Lansing, Michigan, which subsequently discharges to Lake Michigan.

Surface water drainage at the facility is toward the west and southwest to the Red Cedar River. Storm sewers approximately 40 feet from the facility building drain directly into the Red Cedar River. Plugs are in the drain to prevent releases to surface water. According to facility representatives, stormwater retained in catch basins are visually checked for releases before the stormwater is discharged.

2.6.3 Geology and Soils

No site-specific geologic information was available, so regional information was used. East Lansing is located in Michigan's lower peninsula and in the Central Lowlands physiographic province. The province is characterized by glacial deposits underlain by sedimentary bedrock of the Paleozoic and Mesozoic Eras. Area glacial deposits consist of sand, silt, gravel, and clay.

The topography of Ingham County consists of glacial features characterized by flat till plains to slight hilly areas of moraines and outwash deposits. Surficial deposits in the East Lansing area predominantly consist of glacial outwash plains.

The Pennsylvanian Period bedrock in the area consists of the Saginaw and Grand River Formations, which are hydraulically connected. The Saginaw Formation consists of sandstones and shales interbedded with limestone and coal. Its thickness ranges from 10 to several hundred feet. The Grand River Formation, which consists of sandstone, lies below the Saginaw Formation and varies in thickness. The Grand River Formation is eroded in the East Lansing Area (NWS, 1990).

Soil borings were drilled at the facility during the removal of the USTs in 1986. Soil at approximately 6 feet bgs consists of fill sand, clay binder, and pebbles. From 6 to 11.5 feet bgs compact brown sand with medium coarse layers is present. Stiff gray clay is present below 11 feet bgs (SEG 1986).

2.6.4 Groundwater

Ingham County obtains drinking water from two principal aquifer systems: (1) a glacial outwash and lacustrine aquifer, and (2) a bedrock aquifer system. The glacial outwash and lacustrine aquifer system ranges in thickness from 10 to several hundred feet and produces up to 1,000 gallons per minute (gpm) of water. Organic soil and glacial fill material are present from 0 to 23 feet bgs. The glacial aquifer system is composed of outwash and glaciofluvial deposits of sand and gravel.

The bedrock aquifer system of the Saginaw Formation is Ingham County's principle bedrock aquifer. The Saginaw Formation ranges in thickness from 10 to several hundred feet and yields up to 300 gpm. The depth to the bedrock aquifer in Ingham County typically ranges from 150 to 220 feet bgs. Static water levels in Ingham County range from 25 to 50 feet bgs. The water is confined and has an average transmissivity of 130,300 square feet per day. Groundwater in the Saginaw Formation flows northeast (USDA 1979).

The static water levels beneath the facility are 5.7 to 6.8 feet bgs (SEG 1986).

2.7 RECEPTORS

The Ciba-Geigy facility occupies 3 acres in a mixed-use residential and industrial area in East Lansing, Michigan. East Lansing has a population of about 48,300.

The Ciba-Geigy facility is bordered on the north by Tuffy Shocks, Brakes, and Mufflers; on the west by Capitol Lighting Company; on the south by Cruse Communication Company; and on the east by a residence and a facility under construction. The nearest residence is located about 50 feet east of the facility. Facility access is controlled by a 6-foot-high fence that surrounds the facility.

The nearest surface water body, Red Cedar River, is located southwest of the facility and is used to collect surface water runoff. The nearest sensitive environment, a seasonally forested, palustrine wetland, is located about 200 feet southeast of the facility (DOI 1993).

Groundwater is used as a source of drinking water in the area. The nearest drinking water wells are in the East Lansing municipal well field located 0.5 mile south and downgradient of the facility. The nearest well is located 200 feet east of the facility and is a groundwater monitoring well. The Red Cedar River is located between the facility and these wells.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the three SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Hazardous Waste Storage Area I

Unit Description:

This unit is located inside the manufacturing and warehouse building. The unit measures 20 by 30 feet and consists of a sealed, reinforced concrete floor; a masonry block east wall, and a vent hood with associated ductwork along the east wall.

Date of Startup:

This unit began operation in 1986.

Date of Closure:

The facility has completed closure of the unit, but the closure has not been approved by MDNR. The unit currently manages hazardous waste for less than 90 days.

Wastes Managed:

This unit manages off-specification and outdated urethane hardener (D009), ignitable spent solvents (D001 and F005), and spent halogenated flush solvents (F002) in 55-gallon drums. This unit also manages nonhazardous resins, acrylics, and isocyanates. When full, the drums of waste are taken to Hazardous Waste Management Unit III (SWMU 3).

Release Controls:

The unit is located indoors. All floor drains in the building have been sealed.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

The unit contained the following hazardous wastes at the time of the VSI: one 55-gallon drum of D009, one 55-gallon drum of F002, one 55-gallon drum of D001 and F005. The unit contained the following nonhazardous wastes two 55-gallon drums of resin, one 55-gallon drum of isocyanate, and one 55-gallon drum of acrylic. PRC did not observe any signs of spills or leaks at the unit (see Photograph No. 3).

SWMU 2

Hazardous Waste Storage Area II

Unit Description:

This unit consists of a 20- by 20-foot area in the manufacturing and warehouse building. The unit consists of a sealed, reinforced concrete floor; a masonry block east wall; and a vent hood with associated ductwork along the east wall.

Date of Startup:

This unit began operations in 1986.

Date of Closure:

The facility has completed closure of the unit, but the closure has not been approved by MDNR. The unit currently manages hazardous waste for less than 90 days.

Wastes Managed:

This unit manages 55-gallon drums of flammable rags (D001 and F005), spent halogenated flush solvent (F002), and ignitable spent solvent (D001 and F005). When full, the drums are taken to Hazardous Waste Storage Area III (SWMU 3).

Release Controls:

This unit is located indoors on a concrete floor. All drains in the building are plugged.

**History of
Documented Releases:**

No releases have been documented from this unit.

Observations:

At the time of the VSI, PRC observed two 55-gallon drums of waste with waste code D001 and two 55-gallon drums of waste with waste code F005 (see Photographs No. 1 and 2).

SWMU 3

Hazardous Waste Storage Area III

Unit Description:

This unit consists of a fabricated steel building measuring 20 by 80 feet outside and west of the manufacturing and warehouse building. The unit has a reinforced concrete floor, an uninsulated metal roof, and panels on the north and south end of the building. The unit is surrounded by asphalt. Storm sewers are located adjacent to the unit. The southern portion of the building manages hazardous and nonhazardous wastes, and the northern portion of the unit manages raw material.

Date of Startup:

This unit began operations in 1980.

Date of Closure:

The facility has completed closure of the unit, but closure has not been approved by MDNR. The unit currently manages hazardous waste for less than 90 days.

Wastes Managed:

This unit manages the following hazardous wastes in 55-gallon drums: flammable rags (D001 and F005), off-specification and outdated urethane hardener (D009), spent halogenated flush solvent (F002), and ignitable spent solvent (D001 and F005). The unit also manages nonhazardous resins, acrylics, and isocyanates.

Release Controls:

Waste is stored in drums on pallets over a reinforced concrete floor. Plugs are in the drains to prevent releases to surface water. According to facility representatives, the stormwater catch basins are visually checked to ensure no releases have occurred before the plugs are opened to discharge stormwater.

**History of
Documented Releases:**

No releases have been documented from this unit.

Observations:

At the time of the VSI, PRC observed five drums in the unit with waste code F005 and four drums containing waste with waste code D009. All drums were located on wooden pallets (see Photographs No. 4 and 5). Stormwater sewers that discharge to the Red Cedar River are located about 40 feet south of the unbermed unit. On-site soils are located about 30 feet from the unit.

4.0 AREAS OF CONCERN

PRC identified no AOCs during the PA/VSI.

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INITIALS 24V

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VTI identified three SWMUs and no AOCs at the Ciba-Geigy facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1 Hazardous Waste Storage Area I

Conclusions: This unit is located inside the manufacturing and warehouse building. The

unit measures 20 by 30 feet and consists of a sealed, reinforced concrete floor; a masonry block east wall; and a vent hood. The unit has been in use since 1986. The unit currently manages hazardous and nonhazardous waste in 55-gallon drums for less than 90 days. Ciba-Geigy completed closure of this unit in 1989. The storage pad of the unit was triple rinsed during closure. The potential for release to groundwater, surface water, air, and on-site soils from this unit is low. Drums containing wastes are stored indoors on a concrete floor. The 55-gallon drums are stored for less than 90 days to minimize the quantity of waste on site.

Recommendations: Pending MDNR closure approval, PRC recommends no further action for this unit.

SWMU 2 Hazardous Waste Storage Area II

Conclusions: This unit consists of a 20- by 20-foot area in the manufacturing and

warehouse building. The unit has a sealed, reinforced concrete floor; a masonry block east wall; and a vent hood. This unit began operations in 1986

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and currently manages hazardous and nonhazardous wastes for less than 90 days. The unit underwent closure activities in 1989. The unit was triple-rinsed as part of the closure activities. The potential for release to groundwater, surface water, air, and on-site soils from this unit is low. Drums containing wastes are stored indoors on a concrete floor. The 55-gallon drums are stored for less than 90 days to minimize the quantity of waste on site.

Recommendations:

Pending MDNR closure approval, PRC recommends no further action for this unit.

SWMU 3

Hazardous Waste Storage Area III

Conclusions:

This unit consists of a fabricated steel building measuring 20 by 80 feet outside and west of the manufacturing and warehouse building. It consists of a reinforced concrete floor, an uninsulated metal roof, and panels on the north and south ends of the building. The southern portion of the building manages hazardous and nonhazardous wastes. The facility completed closure of this unit in 1989. The unit was triple-rinsed as part of the closure activities. At the time of the VSI, MDNR had not yet approved these closure activities.

The potential for release to groundwater, air, and on-site soils is low. Drums containing wastes are protected from the elements by the structure. The drums are stored on pallets over reinforced concrete to make leak detection possible. The unit is surrounded by asphalt and on-site soils are located about 30 feet away. Wastes are managed in 55-gallon drums for less than 90 days to minimize the quantity of waste stored on-site. The potential for release to surface water from this unit is low. Stormwater sewers that discharge directly to the Red Cedar River have plugs in them to prevent releases. Stormwater catch basins are visually checked to ensure a release has not occurred before the plugs are pulled.

Recommendations:

Pending closure of this unit, PRC recommends no further action.

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TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste Storage Area I	1986 to present	No	None pending closure approval
2. Hazardous Waste Storage Area II	1986 to present	No	None pending closure approval
3. Hazardous Waste Storage Area III	1980 to present	No	None pending closure approval

REFERENCES

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- MDNR. 1983a. Letter regarding Compliance Evaluation Inspection From Leroy Vahovick, Water Quality Specialist. To Mike Munsell, Ciba-Geigy. May 9.
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- MDNR. 1990. Letter regarding Compliance Evaluation Inspection. From Leroy Vahovick, Environmental Quality Analyst. To Mike Munsell, Ciba-Geigy. April 20.
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APPENDIX A
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
(Four Pages)

VISUAL SITE INSPECTION SUMMARY

Ciba-Geigy Corporation (Ciba-Geigy)

4917 Dawn Avenue

East Lansing, MI 48823-5691

MID 067 352 989

Date:

May 26, 1993

Primary Facility Representative:

Mike Munsell, Ciba-Geigy

Representative Telephone No.:

517/333-1303

Inspection Team:

Mary Wojciechowski, PRC Environmental Management, Inc.
(PRC)

Cathy M. Collins, PRC

Photographer:

Cathy M. Collins

Weather Conditions:

Sunny; 65 °F; calm

Summary of Activities:

The visual site inspection (VSI) began at 12:00 p.m. with an introductory meeting. The facility representative informed PRC that he had received a summons to appear in court at 1:30 p.m. The inspection team consulted with the facility representative and agreed to conduct the VSI tour based on the facility's size and history. PRC conducted a short interview which confirmed information regarding facility history and operations.

The VSI tour began at 12:40 p.m. The inspection team walked through the process areas, viewed the areas generating this waste, and the units managing them. The inspection team viewed the following areas: Hazardous Waste Storage Area I (SWMU 1), Hazardous Waste Storage Area II (SWMU 2), and Hazardous Waste Storage Area III (SWMU 3).

The tour concluded at 12:55 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 1:00 p.m.



Photograph No. 1

Orientation: West

Description: Hazardous Waste Management Unit II; waste is located indoors on a concrete floor in this unit

Location: SWMU 2

Date: 5/26/93



Photograph No. 2

Orientation: North

Description: Hazardous Waste Storage Area II; parts washers are located on the left

Location: SWMU 2

Date: 5/26/93



Photograph No. 3

Orientation: Northeast

Description: Hazardous Waste Management Unit I; waste is located indoors on a concrete floor in this unit; drums containing waste are located in the foreground

Location: SWMU 1

Date: 5/26/93



Photograph No. 4

Orientation: West

Description: Hazardous Waste Storage Area III; waste is stored within the shelter; the south side of the shelter is used for waste accumulation; the north side is used for raw material storage

Location: SWMU 3

Date: 5/26/93



Photograph No. 5

Orientation: Southwest

Description: Hazardous Waste Storage Area III; drums containing waste are on pallets

Location: SWMU 3

Date: 5/26/93

APPENDIX B
VISUAL SITE INSPECTION FIELD NOTES
(Four Pages)

ciba

Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, MI 48823-5691
Telephone 517 333-1303
Fax 517 351-9003

Michael L. Munsell
SH & E Manager

Formulated Systems Group

SUNNY 65° F

CALM

PRECIPITATION 5.12⁰⁰
NEAR RESIDENCE

of facility under
construction

Shaw-Winkler

South

CRUSE Communication Co.

N. Tully Street

Brake Mufflers

CIBA - GEIGY

26 MAY 1993

MID

EAST LANSING AVE

4917 DAWN AVE

SUNNY 65°F

CALIM

PRC station site 121° East

near residence

of facility under

construction

Shaw Winkler

South

CRUSE Communication Co.

N. Tully Street

Brake Mufflers

① ③

②

Waste cleaning
process equipment
transport to
storage area
Waste
off spec
material spec
take to storage
from under SAA W
Photo 1 N
Photo 2 N
Storage Area
and Pallets
Resin Solvent
Hardener Solvent
Polymers - 2 -
Concrete

③

off spec
Transfer
in Containers
in drums
Photo 3 NE
Door 1 DR
2 Door 2
1, solvent
1,rylic
1, Foss 1001
Photo 4
West
Hazardous Waste
Storage Area
Photo 5 SW
Storage Area
on Pallets
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④

Removed 11 USN
1985

PCE
land purchased

Area II Clearings
and top off

Area I Alt spec

Area III - 1980

Facility representative
explained he needed
to be in court at 1:30 PM
today. PRC
agreed that

⑤

we will finish the
inspection by
falling at
later dates.
PRC
off-site
at 1:00 pm.

~~My copy~~



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

May 19, 1993

Mr. Mike Munsell
Ciba-Geigy Corporation
4917 Dawn Avenue
East Lansing, Michigan 48823

Re: Visual Site Inspection
Ciba-Geigy Corporation
East Lansing, Michigan 48823
MID 067 352 989

Dear Mr. Munsell:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment and a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for May 26, 1993 at 12:30 p.m. The inspection team will consist of Mary Wojciechowski and Cathy Collins of PRC Environmental Management, Inc., a contractor for

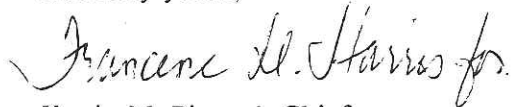
Mr. Mike Munsell
May 19, 1993
Page 2

the U.S. EPA. Representatives of the Michigan Department of Natural Resources may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Francene M. Harris for".

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Ken Burda, MDNR, Chief, Permit Section, Lansing Office